

# EXHIBIT A

# Deposition Transcript

Case Number: 1:24-CV-24228-CMA

Date: July 25, 2025

In the matter of:

MEGAN PETE v MILAGRO ELIZABETH COOPER

CEASAR MCDOWELL

**CERTIFIED  
COPY**

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1 UNITED STATES DISTRICT COURT

2 SOUTHERN DISTRICT OF FLORIDA

3  
4  
5 Civil Action No.1:24-  
CV-24228-CMA

6 MEGAN PETE, an individual,

7 Plaintiff,

8 vs.

9 MILAGRO ELIZABETH COOPER,  
an individual,

10 Defendant.

11  
12  
13 VIDEOTAPED DEPOSITION OF

14 CEASAR MCDOWELL

15 LOS ANGELES, CALIFORNIA

16 FRIDAY, JULY 25, 2025

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19  
20  
21 REPORTED BY:  
RONNY ZAVOSKY  
22 CSR NO. 12359  
JOB NO. 1837675  
23  
24  
25

CEASAR MCDOWELL  
JULY 25, 2025

JOB NO. 1837675

1 The deposition of CEASAR MCDOWELL was taken on  
2 behalf of the Plaintiff at 865 South Figueroa Street,  
3 10th Floor, Los Angeles California, commencing at  
4 10:26 AM on Friday, July 25th, 2025, before  
5 Ronny Zavosky, CSR No. 12359.

6  
7  
8  
9 A P P E A R A N C E S

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CEASAR MCDOWELL  
JULY 25, 2025

JOB NO. 1837675

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CEASAR MCDOWELL  
JULY 25, 2025

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1 A P P E A R A N C E S (Continued):

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18 ALSO PRESENT:

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21 KRYSTAL THRASHER, STENO TECH

22 DENNIS RIVAS, STENO TECH

23 GABBY TREVINO, PARALEGAL AT QUINN EMANUEL

24 ARAYA BANNER, LEGAL ASSISTANT FOR MICHAEL HAYDEN

25

CEASAR MCDOWELL  
JULY 25, 2025

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10:26 AM

- - -

THE VIDEOGRAPHER: We are now on the record.

My name is Steve Petersen. I am a notary public contracted by Steno. I am not financially interested in this action, nor am I a relative or employee of any of the attorneys or any of the parties.

Today is Friday, July 25th, 2025, and the time is 10:26 AM Pacific time. This deposition is taken at 865 South Figueroa Street, Tenth Floor, Los Angeles, California 90017. The name of the case is Pete versus Cooper filed in the United States District Court, for the Southern District of Florida, Case Number 1:24-CV-24228-CMA.

This is the video-recorded deposition of Ceasar McDowell, Volume I. The attorney taking this deposition is Marie Hayrapetian.

Would Counsel please identify yourselves and state who you represent.

MS. HAYRAPETIAN: Good morning. My name is Marie Hayrapetian. I represent the Plaintiff, Megan Pete. I am joined by my colleague Bomie Lee and my colleagues Alanah Harris remotely and our paralegal Gabby Trevino.

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10:27:39 1 MR. HAYDEN: Good morning. Michael Hayden for  
10:27:41 2 the deposed, Ceasar McDowell, as his attorney and  
10:27:45 3 attorney of Unite the People Inc. Here with legal  
10:27:49 4 assistant Araya Banner -- Banning. Sorry.

10:27:54 5 MS. DIXON: Hi. Ronda Dixon. And I represent  
10:27:57 6 Milagro Cooper.

10:27:59 7 THE VIDEOGRAPHER: We are ready to proceed.

10:28:01 8 The court reporter today is Ronny Zavosky with  
10:28:05 9 Steno.

10:28:05 10 Would the reporter please swear in the  
10:28:07 11 witness.

10:28:07 12 THE COURT REPORTER: My name is Ronny Zavosky.  
10:28:07 13 I am a certified shorthand reporter licensed in the  
10:28:07 14 state of California. My license number is 12359.  
10:28:07 15 I will now swear in the witness.

10:28:07 16 - - -

10:28:08 17 CEASAR McDOWELL,  
10:28:08 18 having first declared under penalty of perjury to tell  
10:28:08 19 the truth, was examined and testified as follows:

10:28:36 20 THE WITNESS: Sure.

10:28:36 21 - - -

10:28:36 22 EXAMINATION

10:28:37 23 BY MS. HAYRAPETIAN:

10:28:38 24 Q Good morning. I represent Ms. Megan Pete, and  
10:28:43 25 my name is Marie Hayrapetian.

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10:28:46 1 Could you please state and spell your name for  
10:28:47 2 the full record?  
10:28:48 3 A Ceasar.  
10:28:49 4 Q Do you have a last name?  
10:28:50 5 A Yeah. McDowell.  
10:28:51 6 Q And have you ever used any other names?  
10:28:53 7 A A lot of them.  
10:28:54 8 Q Could you list them out for me.  
10:28:56 9 A I can't remember them.  
10:28:58 10 This ain't going to go good. You know that;  
10:29:00 11 right?  
10:29:01 12 MR. HAYDEN: Just answer.  
10:29:02 13 THE WITNESS: I did.  
10:29:03 14 BY MS. HAYRAPETIAN:  
10:29:03 15 Q Could you please list all --  
10:29:08 16 A No.  
10:29:08 17 Q -- legal names. Could you please list --  
10:29:13 18 A No.  
10:29:17 19 You ever hear of "Great Ape Beegle Beagle"?  
10:29:18 20 It's a great cartoon.  
10:29:22 21 Q Okay. Let's go off the record. I'm going to  
10:29:25 22 get the Judge on the phone because I can already tell  
10:29:28 23 this is --  
10:29:29 24 A -- not going to go good.  
10:29:31 25 THE VIDEOGRAPHER: The time is 10:29 AM



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10:29:33 1 Pacific time. We are now off the record.

10:29:44 2 (Recess was taken.)

10:36:34 3 THE VIDEOGRAPHER: The time is 10:36 AM

10:36:40 4 Pacific time. We are back on the record.

10:36:44 5 MS. HAYRAPETIAN: Okay. Hopefully, the mood

10:36:46 6 in the room has shifted since I gave Mr. McDowell a

10:36:50 7 little break to collect himself, and I'm hoping we can

10:36:54 8 get off to a better start now.

10:36:55 9 BY MS. HAYRAPETIAN:

10:36:58 10 Q Have you ever used any other names aside from

10:37:02 11 Ceasar McDowell?

10:37:03 12 A A lot of them.

10:37:04 13 Q How many?

10:37:05 14 A I don't remember.

10:37:05 15 Q Can you name one?

10:37:07 16 A No.

10:37:08 17 Q Why not?

10:37:08 18 A 'Cause I don't remember.

10:37:10 19 Q Okay. Do you frequently forget your own name?

10:37:14 20 A No. I know my name.

10:37:15 21 Q Okay. Do you frequently forget your own

10:37:17 22 nicknames?

10:37:18 23 A They weren't nicknames. You said did I use

10:37:20 24 any names.

10:37:20 25 Q Did you use any names?

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10:37:22 1 A No. I don't remember.

10:37:23 2 Q Okay. Do you have any nicknames?

10:37:26 3 A Yeah.

10:37:27 4 Q What are they?

10:37:28 5 A The Gooch.

10:37:29 6 Q The Gooch.

10:37:30 7 What does that mean?

10:37:31 8 A It was the bully on Arnold.

10:37:33 9 Q Okay. Do you have any other nicknames?

10:37:36 10 A Nope.

10:37:37 11 Q Any aliases?

10:37:39 12 MR. HAYDEN: Objection. Asked and answered.

10:37:41 13 BY MS. HAYRAPETIAN:

10:37:41 14 Q Any names used on social media?

10:37:44 15 A Not that I remember.

10:37:45 16 Q Okay. Is Mr. Michael Hayden at Unite the

10:37:49 17 People representing you as your attorney in connection

10:37:51 18 with this deposition?

10:37:53 19 A Yeah. That's him.

10:37:55 20 Q Unite the People no longer represents

10:37:56 21 Ms. Cooper in this litigation; correct?

10:37:59 22 A I don't know.

10:38:01 23 Q Have you ever been deposed before?

10:38:04 24 A I don't remember.

10:38:07 25 Q Okay. Other than depositions, have you ever

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10:38:11 1 testified under oath in court?

10:38:13 2 A I don't think so.

10:38:15 3 Q Have you ever attended a hearing?

10:38:17 4 A My own.

10:38:18 5 Q Okay. What hearing was that?

10:38:23 6 A A few of them.

10:38:26 7 Q What's the most recent hearing of yours you've

10:38:28 8 attended?

10:38:30 9 A Parole board.

10:38:32 10 Q When was that?

10:38:33 11 A I don't remember.

10:38:34 12 Q Okay. And what was the hearing about?

10:38:36 13 A Parole.

10:38:37 14 Q Why were you on parole?

10:38:39 15 A I wasn't on parole when I had the hearing. I

10:38:41 16 was in prison.

10:38:42 17 Q Okay. What were you in prison for?

10:38:45 18 A I don't remember.

10:38:48 19 Q Okay. How long were you in prison?

10:38:50 20 A I don't really remember.

10:38:50 21 MR. HAYDEN: Objection. Relevance.

10:38:53 22 BY MS. HAYRAPETIAN:

10:38:54 23 Q Any other hearings you've attended?

10:38:56 24 A Nope.

10:38:57 25 Q And what was the subject matter of the -- the

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10:39:01 1 hearing?

10:39:06 2 A I said I didn't attend any other hearings.

10:39:08 3 Which hearings are you referring to?

10:39:10 4 Q The one you were in prison for.

10:39:12 5 A The parole board? For parole.

10:39:13 6 Q Okay. And what were you in prison for?

10:39:15 7 MR. HAYDEN: Objection. Relevance.

10:39:17 8 THE WITNESS: Being Black.

10:39:18 9 Or was I not supposed to answer yet? Okay.

10:39:20 10 Good.

10:39:22 11 MR. HAYDEN: You can answer.

10:39:22 12 THE WITNESS: Okay.

10:39:22 13 BY MS. HAYRAPETIAN:

10:39:23 14 Q Okay. Do you understand you are giving

10:39:25 15 testimony under oath?

10:39:27 16 A Yep.

10:39:28 17 Q Do you understand that you are under the same

10:39:29 18 oath today as if you were testifying in court?

10:39:31 19 A Yes, ma'am.

10:39:32 20 Q I will be asking you questions. Sometimes

10:39:33 21 your counsel or Ms. Cooper's counsel might object, but

10:39:37 22 you still need to answer my question.

10:39:39 23 Do you understand?

10:39:40 24 A I hear you.

10:39:42 25 Q When lawyers make objections they're usually

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10:39:44 1 just preserving them for the record to argue later  
10:39:46 2 before the judge. The only time you don't answer a  
10:39:48 3 question is if your lawyer specifically instructs you  
10:39:52 4 not to answer which happens in limited circumstances.  
10:39:54 5 Do you understand?  
10:39:55 6 A Not really.  
10:39:58 7 Q What don't you understand?  
10:39:59 8 A What you just said.  
10:40:00 9 Q Okay. So I will ask questions.  
10:40:03 10 A Sure.  
10:40:03 11 Q Your lawyer may object, but that means -- that  
10:40:06 12 doesn't mean you do not answer my question. You still  
10:40:09 13 answer my question, unless he --  
10:40:11 14 A If I want to answer; right?  
10:40:15 15 MR. HAYDEN: Unless I specify -- instruct the  
10:40:17 16 witness not to answer, you don't answer.  
10:40:19 17 THE WITNESS: Okay. I understood that.  
10:40:21 18 BY MS. HAYRAPETIAN:  
10:40:22 19 Q Because the court reporter is transcribing  
10:40:25 20 this deposition, it's also important that only one  
10:40:28 21 person speak at a time. I ask that you wait until I  
10:40:30 22 finish my question before you begin to answer, and I'll  
10:40:33 23 do my best to wait for you to finish your answer before  
10:40:36 24 I start my next question.  
10:40:37 25 Do you understand?

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10:40:38 1 A Yep.

10:40:39 2 Q If you answer a question, I, and anyone who  
10:40:41 3 reads the deposition transcript, will assume you  
10:40:44 4 understood the question.

10:40:44 5 Do you understand?

10:40:47 6 A Yep.

10:40:47 7 Q So, if you don't not understand a question,  
10:40:49 8 please ask for clarification. Okay?

10:40:51 9 A Sure.

10:40:53 10 Q We can take a break any time except we can't  
10:40:58 11 take a break while a question is pending; so you'll need  
10:41:01 12 to answer any pending question before we take a break.

10:41:05 13 Do you understand?

10:41:05 14 A Sure.

10:41:06 15 Q Are you able to put your phone aside?

10:41:07 16 A Sure.

10:41:08 17 Q Do you think you could put it facedown a  
10:41:13 18 little -- away from your reach?

10:41:17 19 A Are you going to handcuff me too? I can't  
10:41:19 20 have my phone? You got your phone.

10:41:22 21 MR. HAYDEN: I'll just put mine down too.

10:41:23 22 BY MS. HAYRAPETIAN:

10:41:24 23 Q Have you taken any drugs or medication that  
10:41:26 24 could impair your ability to hear my questions,  
10:41:28 25 understand them, and answer them truthfully?

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10:41:32 1 A I don't think so.

10:41:33 2 Q You don't think so?

10:41:33 3 A Uh-huh.

10:41:35 4 Q Have you taken any cannabis today?

10:41:36 5 A No. I don't smoke weed.

10:41:39 6 Q Okay. Any alcohol?

10:41:39 7 A No.

10:41:40 8 Q Any other substances?

10:41:41 9 A My eye steroid.

10:41:44 10 Q Okay. And what's wrong with your eye?

10:41:47 11 A That, I didn't know.

10:41:48 12 Q Okay. Any other medications you've taken this

10:41:51 13 morning or in the last 12 hours?

10:41:55 14 A Asthma inhaler.

10:41:56 15 Q Okay. I'll be referring to the Plaintiff

10:42:00 16 Megan Pete by different names -- Megan Thee Stallion,

10:42:03 17 Ms. Pete, or just Megan.

10:42:04 18 You will understand I'm talking about the same

10:42:06 19 person; correct?

10:42:07 20 A Sure.

10:42:07 21 Q I'll be referring to the Defendant

10:42:09 22 Milagro Cooper as Milagro Gramz, Ms. Cooper, or Milagro.

10:42:13 23 You'll understand that I am talking about the

10:42:14 24 same person; correct?

10:42:15 25 A Sure.

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10:42:16 1 Q I'll be referring to Daystar Peterson as  
10:42:19 2 Tory Lanez or just Tory.

10:42:21 3 You'll understand I am talking about the same  
10:42:22 4 person; correct?

10:42:23 5 A Sure.

10:42:23 6 Q I'll be referring to Sonstar Peterson as  
10:42:25 7 Mr. Peterson or just Sonstar.

10:42:27 8 You'll understand I'm talking about Tory's  
10:42:29 9 father; correct?

10:42:29 10 A Tory's father?

10:42:30 11 Q Correct.

10:42:31 12 A Sure.

10:42:32 13 Q You are familiar with what happened between  
10:42:34 14 Megan and Tory on July 12th, 2020; correct?

10:42:39 15 A No.

10:42:40 16 Q Are you aware that Tory shot Megan in  
10:42:44 17 July 2020?

10:42:45 18 MR. HAYDEN: Objection. Speculation.

10:42:51 19 BY MS. HAYRAPETIAN:

10:42:51 20 Q You know Troy was convicted of shooting of  
10:42:53 21 Megan with a gun; correct?

10:42:54 22 A I don't think that's what it said but sure.

10:42:56 23 Q Okay. When I refer to the shooting or the  
10:42:59 24 July 2020 incident, you'll know I'm talking about the  
10:43:03 25 shooting we just discussed; correct?



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10:43:06 1 A Sure.

10:43:06 2 Q And Unite the People and UTP mean the same

10:43:09 3 organization; correct?

10:43:11 4 A It depends on who you ask.

10:43:15 5 Q Well, I'm asking you.

10:43:17 6 A I like that. That was good. Sure.

10:43:21 7 Q Okay. Great. Did you meet Mr. Hayden --

10:43:25 8 did you meet with Mr. Hayden to prepare for this

10:43:28 9 deposition?

10:43:29 10 A I don't remember.

10:43:31 11 Q Okay. Did you meet with any other attorneys

10:43:35 12 to prepare for this deposition?

10:43:37 13 A No.

10:43:38 14 Q Did you meet with anyone else at UTP to

10:43:40 15 prepare for this deposition?

10:43:42 16 A No.

10:43:44 17 Q Did you look at any documents with

10:43:48 18 Mr. Hayden to prepare for this deposition?

10:43:51 19 A I don't remember.

10:43:53 20 Q Did you meet with any of Ms. Cooper's current

10:43:57 21 attorneys?

10:43:58 22 A No.

10:43:58 23 Q Did you have a chance to talk to Ms. Cooper's

10:44:03 24 attorney, Ms. Ronda Dixon, this morning?

10:44:07 25 A No.

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10:44:08 1 Q Okay. How did you prepare for today?

10:44:14 2 A I didn't. I just got up and came here.

10:44:16 3 Q You are the co-founder and CEO of UTP;

10:44:19 4 correct?

10:44:20 5 A Unite the People.

10:44:21 6 Q And is it fine if we call them "UTP" for

10:44:23 7 short?

10:44:24 8 A Sure.

10:44:26 9 Q So are you the co-founder?

10:44:27 10 A Of Unite the People? Yes.

10:44:29 11 Q And you are the CEO?

10:44:30 12 A Yes, ma'am.

10:44:31 13 Q Okay.

10:44:33 14 MS. HAYRAPETIAN: Marking as Exhibit 77, can I

10:44:38 15 have Tab 2, please?

10:44:41 16 THE COURT REPORTER: 76.

10:44:46 17 MS. HAYRAPETIAN: 76.

10:44:51 18 THE WITNESS: Did we announce who all the

10:44:52 19 people are on Zoom?

10:44:54 20 MS. HAYRAPETIAN: Yes. We've already

10:44:54 21 announced that.

10:44:55 22 THE WITNESS: We did? Who is that Los Angeles

10:44:58 23 VC Mobile? What is that?

10:44:59 24 MS. HAYRAPETIAN: That's this office.

10:45:01 25 THE WITNESS: Oh, okay.

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10:45:17 1 STENO TECH: Exhibit 77?

10:45:21 2 MS. HAYRAPETIAN: Exhibit 76.

10:45:21 3 STENO TECH: 76.

10:45:21 4 (Exhibit 76 was marked for identification.)

10:45:22 5 BY MS. HAYRAPETIAN:

10:45:22 6 Q Is this your bio on the website of UTP?

10:45:46 7 A Yeah. It looks like it.

10:45:48 8 Q Did you write this bio?

10:45:49 9 A No.

10:45:49 10 Q Who wrote it for you?

10:45:51 11 A I don't remember.

10:45:51 12 Q You co-founded UTP with Mitchell McDowell?

10:45:59 13 A Unite the People, yeah.

10:46:00 14 Q And Mitchell McDowell is your brother;

10:46:03 15 correct?

10:46:04 16 A We haven't taken a DNA test, but that's what

10:46:07 17 they say.

10:46:09 18 Q Mitchell currently serves as the president of

10:46:11 19 UTP?

10:46:13 20 A You'd have to ask him.

10:46:14 21 Q As CEO, you don't know who the president of

10:46:17 22 UTP is?

10:46:18 23 A I don't remember.

10:46:20 24 Q Are there any other co-founders of UTP?

10:46:24 25 A No.

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10:46:25 1 Q What is the primary mission of UTP?

10:46:32 2 A Why? Why are -- why are you asking me what

10:46:35 3 the mission is of UTP?

10:46:38 4 Q We are taking your deposition, you are the CEO

10:46:41 5 of an organization, and I would like to learn more about

10:46:43 6 the organization.

10:46:46 7 MR. HAYDEN: Objection. Calls for a

10:46:47 8 narrative.

10:46:54 9 BY MS. HAYRAPETIAN:

10:46:54 10 Q Do you want the question repeated?

10:46:56 11 A What question?

10:46:58 12 Q My pending question.

10:46:59 13 A What is your pending question?

10:47:00 14 Q What is the primary mission of UTP?

10:47:02 15 A We have a lot of them.

10:47:03 16 Q Okay. Can you name the top two.

10:47:06 17 A Yeah. Top two? I would say helping the kids

10:47:12 18 and helping the homeless.

10:47:13 19 Q And how do you help the kids?

10:47:16 20 A It's a lot of ways -- mentoring programs,

10:47:19 21 things like that.

10:47:19 22 Q And how do you help the homeless?

10:47:22 23 A It's cold outside. Blankets.

10:47:25 24 Q Anything else Unite the People does?

10:47:27 25 A Yeah. A lot of stuff.

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10:47:29 1 Q What else?

10:47:30 2 A Sober living. We do sober living homes for

10:47:36 3 people.

10:47:37 4 Q And you guys also do legal work?

10:47:41 5 A Yeah. We do some of that too.

10:47:43 6 Q Okay. What kind of legal work?

10:47:45 7 A We do a lot.

10:47:47 8 Q What kind of clients do you take on?

10:47:49 9 A The ones that call us.

10:47:51 10 Q And what kind of clients call you?

10:47:55 11 A Black people, White people, Hispanic people,

10:47:58 12 Asian people -- people that need help.

10:48:00 13 Q And what type of cases do they call you for?

10:48:06 14 A A lot of different things they call for.

10:48:08 15 Doesn't mean we do them, but they call for a lot of

10:48:10 16 them.

10:48:11 17 Q Okay. So would you classify that as criminal

10:48:14 18 cases?

10:48:15 19 A Sure. We do those too.

10:48:17 20 Q Do you do civil cases?

10:48:20 21 A I think so.

10:48:23 22 Q How did you obtain the financial resources

10:48:26 23 necessary to establish Unite the People?

10:48:28 24 A I don't remember.

10:48:30 25 Q Did you contribute your own finances to

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10:48:32 1 setting up UTP?

10:48:34 2 A I don't remember.

10:48:35 3 Q Did your brother Mitchell contribute any

10:48:37 4 funds?

10:48:37 5 A I don't remember.

10:48:38 6 Q Who else contributed funds?

10:48:40 7 A I don't remember.

10:48:41 8 Q Did you take out any loans?

10:48:43 9 A I don't remember.

10:48:44 10 Q Did you receive any donations?

10:48:45 11 A I don't remember.

10:48:46 12 Q Does UTP have a physical office?

10:48:51 13 A Yes.

10:48:52 14 Q Where is that?

10:48:54 15 A In Long Beach.

10:48:55 16 Q Okay. How long has UTP had a physical office?

10:49:00 17 A I don't remember.

10:49:01 18 Q When did you establish UTP?

10:49:11 19 A 2016.

10:49:12 20 Q Did UTP have any employees when it first

10:49:15 21 began?

10:49:16 22 A I don't remember.

10:49:17 23 Q How many employees did you have back then when

10:49:19 24 it started?

10:49:21 25 A I just said, "I don't remember"; so how would

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10:49:23 1 I know how many employees?

10:49:24 2 Q Was it just you and your brother?

10:49:26 3 A I don't remember.

10:49:27 4 Q Okay. How many employees do you have now?

10:49:31 5 A A few.

10:49:32 6 Q How many?

10:49:34 7 A Maybe, like, 15, 20.

10:49:37 8 Q Okay. And in what kind of roles are those 15,

10:49:40 9 20?

10:49:46 10 A Administrative.

10:49:48 11 Q Administrative. Okay.

10:49:49 12 And do you have lawyers currently, aside from

10:49:52 13 Mr. Hayden?

10:49:53 14 A Yes.

10:49:54 15 Q Who?

10:49:54 16 A I don't remember.

10:49:55 17 Q Okay. Would you say you have two lawyers

10:49:59 18 working at UTP?

10:50:01 19 A Probably so.

10:50:02 20 Q Okay. Maybe three?

10:50:05 21 A I don't think so.

10:50:06 22 Q How many paralegals do you have there?

10:50:09 23 A I don't remember.

10:50:10 24 Q How many legal assistants?

10:50:13 25 A I don't remember.

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10:50:14 1 Q Okay. Do you have a best estimate?

10:50:17 2 A 15.

10:50:18 3 Q 15 legal assistants?

10:50:21 4 A No. I thought we were talking about people.

10:50:23 5 Q I'm just asking about legal assistants,

10:50:25 6 support staff.

10:50:27 7 A Probably about 10.

10:50:28 8 Q 10 legal assistants?

10:50:30 9 A Probably so.

10:50:31 10 Q Okay.

10:50:31 11 A Support staff.

10:50:32 12 Q Support staff.

10:50:33 13 A Sure.

10:50:34 14 Q Did UTP recruit lawyers from 2016 forward, or

10:50:41 15 did that start later?

10:50:43 16 A I don't remember.

10:50:46 17 Q Do you recall what the first case UTP took on

10:50:48 18 was?

10:50:49 19 A No.

10:50:51 20 Q Do you recall how long ago it was?

10:50:53 21 A No.

10:50:53 22 Q How did you become the CEO of UTP?

10:51:00 23 A By working hard.

10:51:02 24 Q Okay. Why did you take the title of CEO?

10:51:07 25 A I don't remember.



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10:51:08 1 Q What are your responsibilities as CEO of UTP?

10:51:11 2 A I don't remember.

10:51:12 3 Q You don't know your daily responsibilities?

10:51:13 4 A No. I have a lot of them.

10:51:15 5 Q Okay. Can you name one?

10:51:17 6 A Work hard.

10:51:21 7 Q Okay. And so what do you do on a day-to-day?

10:51:24 8 A Work hard.

10:51:27 9 Q And how do you work hard?

10:51:28 10 A I put mattresses upstairs. I lift bunk beds,

10:51:32 11 dressers. I clean out carports. I feed the homeless.

10:51:37 12 I do a lot.

10:51:39 13 Q Okay. And this is all work for UTP?

10:51:41 14 A Every day.

10:51:42 15 Q As CEO, are you responsible for determining

10:51:47 16 the overall vision and objectives of UTP?

10:51:52 17 A Maybe.

10:51:55 18 Q Maybe?

10:51:55 19 A Yeah.

10:51:56 20 Q What does that mean?

10:51:57 21 A Well, I'm not a dictator.

10:51:59 22 Q Okay.

10:52:00 23 A Yeah.

10:52:00 24 Q So how do you manage?

10:52:06 25 A How do I manage what?

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10:52:07 1 Q Your staff?

10:52:11 2 A What do you mean by that? Can you explain?

10:52:13 3 Q You are a CEO; right?

10:52:14 4 A Sure.

10:52:14 5 Q You lead the company?

10:52:16 6 A Okay.

10:52:16 7 Q How do you lead the company?

10:52:19 8 A By working hard.

10:52:20 9 Q Who at UTP do you have authority over as CEO?

10:52:29 10 A Everybody there.

10:52:30 11 Q Okay. So everyone --

10:52:32 12 A That was a good answer. I answered just what

10:52:33 13 you wanted; huh? Everybody there.

10:52:35 14 Q Yeah. Exactly.

10:52:37 15 A Sure.

10:52:38 16 Q Are there any people in particular that are

10:52:40 17 your direct reports?

10:52:42 18 A Are my direct reports?

10:52:44 19 Q Yes.

10:52:45 20 A I don't remember.

10:52:46 21 Q Does Mr. Hayden report to you?

10:52:51 22 A Yes.

10:52:52 23 Q As CEO, do you make the ultimate decisions

10:52:54 24 about which cases UTP takes on?

10:52:57 25 A No. The lawyers do.

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10:52:58 1 Q Okay. Do you decide which clients UTP will  
10:53:01 2 represent?  
10:53:03 3 A I'm not a lawyer.  
10:53:07 4 Q Do you -- are you involved in the  
10:53:08 5 decision-making of the types of cases UTP should take  
10:53:11 6 on?  
10:53:12 7 A The types of cases? Yes.  
10:53:14 8 Q Okay. And what types of cases are those?  
10:53:17 9 A Where the people need us, and we can help.  
10:53:19 10 Q Okay.  
10:53:20 11 A Those are the ones we take.  
10:53:22 12 Q What's the most recent case you've taken on?  
10:53:24 13 A I don't know. I don't know.  
10:53:25 14 Q What's the favorite case you've taken on?  
10:53:27 15 A Tory Lanez.  
10:53:29 16 Q Okay. And which one -- which one of his cases  
10:53:31 17 are we talking about?  
10:53:33 18 A I don't know what you are talking about --  
10:53:33 19 which ones. He has multiple cases.  
10:53:38 20 Q You tell me.  
10:53:39 21 A Oh. I don't know.  
10:53:40 22 Q Which one of his -- which case of his are you  
10:53:42 23 talking about that's your favorite?  
10:53:45 24 A Well, maybe his case isn't my favorite.  
10:53:47 25 Allan McIntosh case is my favorite.

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10:53:51 1 Q Okay. And what's that case about?

10:53:52 2 A A guy that was basically Black while driving

10:53:56 3 and given 25 to life, plus five years, and we got him

10:54:00 4 free from prison. That's my favorite case.

10:54:03 5 Q Okay. And why was it your favorite case?

10:54:05 6 A 'Cause he is a good guy.

10:54:07 7 Q Okay. And how did you meet him?

10:54:09 8 A In prison.

10:54:12 9 Q And where were you in prison?

10:54:14 10 A Everywhere.

10:54:16 11 Q Because you were transferred?

10:54:18 12 A Yeah.

10:54:19 13 Q How many times were you transferred?

10:54:20 14 A Twenty.

10:54:22 15 Q How come you were transferred so many times?

10:54:25 16 A 'Cause I did so many years. They transfer you

10:54:27 17 ever year, if you are good, and I was good.

10:54:30 18 Q Okay. Do you control UTP's budget and

10:54:34 19 financial decisions?

10:54:36 20 A I don't remember.

10:54:37 21 Q Okay. Do you have the authority to hire and

10:54:39 22 fire UTP employees?

10:54:42 23 A Yes.

10:54:44 24 Q Do you determine fee arrangements with

10:54:46 25 clients?

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10:54:47 1 A No.

10:54:48 2 Q Who determines fee arrangements with clients?

10:54:51 3 A I would think the lawyers did it.

10:54:53 4 Q Okay. As CEO, do you decide how UTP's

10:54:57 5 resources are allocated between different cases?

10:55:00 6 A Between different cases?

10:55:02 7 Q Uh-huh.

10:55:04 8 A I don't think so.

10:55:05 9 Between cases you are saying?

10:55:06 10 Q Yeah.

10:55:07 11 A No.

10:55:08 12 Q Okay. You understand there's a difference

10:55:11 13 between running UTP's business operations and providing

10:55:14 14 legal advice; correct?

10:55:15 15 A 100 percent.

10:55:18 16 Q As CEO, you focus on business decisions

10:55:23 17 rather -- rather than legal strategy; correct?

10:55:25 18 A I don't know.

10:55:26 19 Q You don't provide legal advice to UTP's

10:55:29 20 clients; correct?

10:55:30 21 A That's against the law.

10:55:32 22 Q You don't have a law license; correct?

10:55:38 23 A I don't remember.

10:55:39 24 Q You never attended law school; correct?

10:55:42 25 A Prison.

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10:55:44 1 Q They had law school in prison?

10:55:45 2 A No. They had prison in prison.

10:55:47 3 Q Okay. So you didn't attend law school?

10:55:48 4 A I went to prison.

10:55:50 5 Q You are not a lawyer?

10:55:52 6 A No.

10:55:52 7 Q You are not a paralegal?

10:55:54 8 A Well, you don't know. I could be a paralegal.

10:55:58 9 You don't have to have a license to be a paralegal.

10:56:00 10 Q Okay. And that's according to which state's

10:56:02 11 law?

10:56:02 12 A I don't know. You look it up. You are the

10:56:04 13 lawyer.

10:56:05 14 Q Are you saying you are a paralegal?

10:56:07 15 A No. I didn't say that. I said I didn't say I

10:56:10 16 wasn't.

10:56:11 17 Q Okay. Are you a paralegal? Yes or no?

10:56:15 18 A Maybe.

10:56:16 19 Q Maybe?

10:56:17 20 A Yeah.

10:56:17 21 Q Okay. Have you gone to paralegal school?

10:56:21 22 A In prison.

10:56:22 23 Q You went -- you attended paralegal school in

10:56:24 24 prison?

10:56:25 25 A Yeah, they have paralegal school in prison.

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10:56:27 1 Q Did you obtain a certificate?

10:56:29 2 A Actually, I have a few of them.

10:56:30 3 Q Okay. What -- how many paralegal certificates

10:56:33 4 do you have?

10:56:33 5 A I think three.

10:56:34 6 Q Okay. And are you able to produce those?

10:56:38 7 A I didn't bring them with me.

10:56:40 8 Q Okay. But you have them, and they're

10:56:41 9 accessible?

10:56:43 10 A They could be. They're from 20 years ago. It

10:56:44 11 was a long time in prison.

10:56:46 12 Q Okay. So you've been a paralegal for

10:56:48 13 20 years?

10:56:49 14 A I didn't say that.

10:56:50 15 Q You've had paralegal certificates from prison

10:56:52 16 for 20 years?

10:56:53 17 A Just about.

10:56:54 18 Q Okay. Do you consider yourself a legal

10:56:58 19 assistant?

10:56:59 20 A Not at all.

10:57:00 21 Q Do you have legal training?

10:57:02 22 A We just talked about that.

10:57:04 23 Q Do you consider that legal training?

10:57:05 24 A I would think so, yes.

10:57:07 25 Q Okay. You don't translate languages; correct?

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10:57:11 1 A Swahili. I do. I speak fluent Swahili.

10:57:18 2 Q Okay. Do you interpret legal documents in

10:57:21 3 Swahili for UTP clients?

10:57:24 4 A No.

10:57:25 5 Q You are not a consultant; right?

10:57:30 6 A I could be. I could be a consultant; right?

10:57:33 7 Q What kind of consultant are you?

10:57:35 8 A I just said, "I could be."

10:57:36 9 Q You are not a private investigator; right?

10:57:39 10 A No.

10:57:40 11 Q As CEO, do you give instructions to UTP's

10:57:43 12 lawyers?

10:57:44 13 A Do I give instructions to UTP lawyers, you

10:57:48 14 said?

10:57:49 15 Q Yeah.

10:57:49 16 A About what?

10:57:50 17 Q About which cases to take on?

10:57:53 18 A We already talked about that. I already told

10:57:56 19 you the lawyers decide that.

10:57:57 20 Q Lawyers decide.

10:57:58 21 You give no instructions on what types of

10:57:59 22 cases they should take?

10:58:01 23 A Nope.

10:58:01 24 Q Okay. You don't suggest or bring forward the

10:58:05 25 types of cases you'd like them to pursue?



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10:58:09 1 A Do I suggest? Boy, you are being slick with  
10:58:11 2 that. I don't remember.  
10:58:14 3 Q Okay. Do you help them with legal strategy?  
10:58:20 4 A Do I help the lawyers?  
10:58:23 5 Q Uh-huh.  
10:58:23 6 A They went to law school. They know the  
10:58:25 7 strategies, not me.  
10:58:26 8 Q So you don't help them with legal strategy?  
10:58:28 9 A I wouldn't think so.  
10:58:30 10 Q You don't advise them on how to handle  
10:58:35 11 specific client matters?  
10:58:37 12 A Advise them on how to handle -- oh, Lord.  
10:58:41 13 What time is this over?  
10:58:43 14 Q I get to have seven hours on the record.  
10:58:46 15 A Do you?  
10:58:46 16 Q I do.  
10:58:47 17 A All right. So -- but I get to have all the  
10:58:50 18 breaks I want; right? I get something here.  
10:58:53 19 Am I under arrest?  
10:58:54 20 Q We just took a break.  
10:58:55 21 A Okay. When did you take a break?  
10:58:57 22 You took a break, not me. You left. I was  
10:58:59 23 here at the table.  
10:59:00 24 Q Do you need a break?  
10:59:02 25 A Not now.

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10:59:03 1 Q Okay. Great.

10:59:04 2 So do you assist the lawyers?

10:59:08 3 A No.

10:59:09 4 Q You don't assist the lawyers?

10:59:11 5 A Assist the lawyers with what?

10:59:12 6 Q How to handle specific client matters?

10:59:14 7 A I'm not a lawyer.

10:59:16 8 Q Okay. So you don't consult with them on

10:59:17 9 strategy?

10:59:18 10 A No. Those are lawyer jobs.

10:59:20 11 Q Okay. And do you provide input on whether

10:59:23 12 they should withdraw from representation from certain

10:59:26 13 matters?

10:59:28 14 A Do I provide information? I don't remember.

10:59:31 15 Q Have you ever told the lawyers to withdraw

10:59:33 16 from a specific case?

10:59:34 17 A I don't remember.

10:59:37 18 Q Have you ever told the lawyers to take on a

10:59:39 19 specific case?

10:59:40 20 A I don't remember.

10:59:43 21 Q As CEO, do you communicate directly with UTP

10:59:46 22 clients?

10:59:46 23 A Do I communicate? I don't remember.

10:59:48 24 Q Do you need permission from UTP's lawyers

10:59:51 25 before speaking with clients?

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10:59:52 1 A I don't remember.

10:59:53 2 Q Are there any restrictions on what you can

10:59:55 3 discuss with clients?

11:00:01 4 A I don't remember.

11:00:01 5 Q Do UTP lawyers supervise your communications

11:00:04 6 with clients?

11:00:04 7 A I said I don't remember if I communicate just

11:00:07 8 two minutes ago.

11:00:08 9 Q Okay. So --

11:00:09 10 A I don't remember.

11:00:09 11 Q -- you don't remember?

11:00:10 12 A No.

11:00:11 13 Q When there's a disagreement between you and

11:00:14 14 UTP's lawyers about a case, who makes the final

11:00:17 15 decision?

11:00:19 16 A We just said, two minutes ago, that they make

11:00:22 17 the decisions about the cases.

11:00:25 18 Q But, when there's a disagreement between how a

11:00:28 19 case should be handled, who makes the final decision?

11:00:33 20 A I don't remember.

11:00:34 21 Q If you wanted UTP to take on a particular

11:00:37 22 client, could the lawyers refuse?

11:00:40 23 A Always.

11:00:41 24 Q If you wanted UTP to drop a client, could you

11:00:45 25 make that decision as CEO?

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11:00:47 1 A No.

11:00:47 2 Q Your job is to run UTP's business operations;  
11:00:51 3 correct?

11:00:52 4 A Absolutely.

11:00:53 5 Q UTP's lawyers can represent clients without  
11:00:55 6 your involvement; correct?

11:00:57 7 A UTP's lawyers can represent? Sure.

11:01:01 8 Q You get involved because you are the CEO, not  
11:01:03 9 because the lawyers need you; correct?

11:01:07 10 A Lawyers need me?

11:01:09 11 Q Do they need you, or they operate  
11:01:11 12 independently?

11:01:11 13 A Do you need the CEO at your company? It's a  
11:01:16 14 fair question.

11:01:17 15 Q Actually, I don't even know if my company has  
11:01:20 16 a CEO; so --

11:01:22 17 A That's fine. I don't remember.

11:01:24 18 Q Okay. So the lawyers -- just to get a  
11:01:30 19 clarification on my question.

11:01:32 20 A Sure.

11:01:33 21 Q The lawyers don't need you to operate their  
11:01:38 22 cases; correct?

11:01:40 23 A No.

11:01:41 24 Q UTP has several social media accounts; right?

11:01:54 25 A I don't remember how many accounts they have.

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11:01:55 1 Q Do you have one?

11:01:57 2 A Yeah.

11:01:58 3 Q UTP has at least one social media account?

11:02:01 4 A Yes.

11:02:01 5 Q On which platform?

11:02:02 6 A I don't know which one.

11:02:03 7 Q Instagram?

11:02:04 8 A I don't know which one.

11:02:05 9 Q Twitter?

11:02:07 10 A Let's keep going. I don't know which one.

11:02:09 11 Q Okay. You have your phone; right?

11:02:10 12 A No. I put it over there 'cause you asked me

11:02:13 13 to.

11:02:14 14 Q Okay. Can you check to see?

11:02:15 15 A No.

11:02:16 16 Q Okay. Do you personally manage UTP's social

11:02:18 17 media accounts?

11:02:21 18 A No.

11:02:21 19 Q So, if we were to log -- open your Instagram

11:02:27 20 account, the UTP Instagram account would not be logged

11:02:31 21 into your Instagram app?

11:02:33 22 A It might be.

11:02:34 23 Q It might be. Okay.

11:02:36 24 So you are involved in drafting social media

11:02:38 25 posts on UTP accounts; correct?

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11:02:43 1 A I don't remember.

11:02:49 2 Q You have your own social media accounts?

11:02:50 3 A Yes.

11:02:51 4 Q So, when you are posting to your own social

11:02:52 5 media accounts, do you also share to post on UTP's?

11:02:57 6 A I don't remember none of that.

11:02:58 7 Q Okay. Do you have final say over what is

11:03:01 8 posted on UTP's social media accounts?

11:03:03 9 A I don't know who has final say.

11:03:06 10 Q Do you know who runs the social media

11:03:07 11 accounts?

11:03:10 12 A I don't remember.

11:03:11 13 Q Do you have a social media marketing manager?

11:03:15 14 A Sometimes.

11:03:16 15 Q Sometimes. Okay.

11:03:18 16 Can you tell me one of your most recent social

11:03:21 17 media managers?

11:03:23 18 A I've had a few.

11:03:24 19 Q Okay. Give me one name.

11:03:25 20 A Jesse.

11:03:27 21 Q Desi.

11:03:27 22 What's her last name?

11:03:28 23 A I said, "Jesse."

11:03:29 24 Q Jesse.

11:03:30 25 What's her last name?

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11:03:31 1 A Jackson.

11:03:31 2 Q Okay. And anyone else?

11:03:33 3 A There was Jayboo.

11:03:35 4 Q Last name?

11:03:36 5 A Differentdaddy.

11:03:39 6 (The Court Reporter requested clarification.)

11:03:39 7 THE WITNESS: Differentdaddy.

11:03:39 8 Jayboo Differentdaddy.

11:03:40 9 BY MS. HAYRAPETIAN:

11:03:41 10 Q Differentdaddy is the last name?

11:03:42 11 A Uh-huh.

11:03:44 12 Q Anyone else?

11:03:47 13 A I can go on. There's tons of people.

11:03:50 14 Q Okay. Everyone runs the social media account?

11:03:54 15 A Yeah, pretty much. Yeah.

11:03:55 16 Q Okay. But you also have the password, and you

11:03:57 17 can post to it?

11:03:58 18 A I don't have the password.

11:04:00 19 Q But it's logged in to your Instagram?

11:04:03 20 A I don't know.

11:04:03 21 Q Okay. You don't know one way or the other, as

11:04:08 22 in it can be logged in, if we were to check your

11:04:11 23 Instagram app right now?

11:04:12 24 A You can't check my Instagram app.

11:04:15 25 Q If we were, hypothetically speaking, it could

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11:04:16 1 be logged in?

11:04:17 2 A Hypothetically speaking, I don't know.

11:04:19 3 Q Does everyone working at UTP have access to

11:04:24 4 the social media accounts?

11:04:27 5 A I don't know.

11:04:30 6 Q Have you ever sought Tory's feedback or

11:04:32 7 approval on social media posts made on UTP's accounts?

11:04:35 8 A Who?

11:04:35 9 Q Tory.

11:04:36 10 A Tory who?

11:04:36 11 Q Tory Lanez.

11:04:37 12 A Tory Lanez?

11:04:39 13 Q Any time of say "Tory," I'm talking about

11:04:42 14 Tory Lanez.

11:04:43 15 A Oh, okay. Okay.

11:04:46 16 Q Do you have an answer to my question?

11:04:48 17 A What was the question?

11:04:49 18 Q The question was, have you ever sought Tory's

11:04:51 19 feedback or approval on any social media post on UTP's

11:04:54 20 account?

11:04:54 21 A I don't remember.

11:04:55 22 Q You don't remember?

11:04:56 23 A No.

11:04:56 24 Q Okay. Do you remember ever talking to Tory

11:04:59 25 about UTP's social media accounts?



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11:05:02	1	A	I don't remember talking to him, no.
11:05:03	2	Q	You send and respond to direct message on
11:05:06	3		UTP's social media accounts; correct?
11:05:08	4	A	I don't remember.
11:05:09	5	Q	Have you ever exchanged any messages with
11:05:11	6		others about Ms. Cooper?
11:05:14	7	A	I don't remember.
11:05:15	8	Q	Do you have any direct messages with others
11:05:16	9		about Ms. Pete on UTP's accounts?
11:05:19	10	A	I don't remember.
11:05:20	11	Q	You've received alleged tips concerning the
11:05:22	12		subject matter of this action on UTP's social media
11:05:25	13		accounts; correct?
11:05:26	14	A	I don't remember.
11:05:27	15	Q	Have you ever communicated with Ms. Cooper,
11:05:30	16		using any of UTP's social media accounts?
11:05:32	17	A	I don't remember.
11:05:33	18	Q	Have you ever communicated with Tory, using
11:05:35	19		any of UTP's social media accounts?
11:05:37	20	A	I do not remember.
11:05:38	21	Q	Have you ever communicated with Tory's father,
11:05:40	22		using any of UTP's social media accounts?
11:05:44	23	A	I do not remember.
11:05:45	24	Q	Okay. Let's talk a little bit about your
11:05:46	25		background before you founded UTP.

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11:05:49 1 According to your bio, you served a 20-year  
11:05:53 2 sentence at San Quentin prison; is that correct?  
11:05:56 3 A No. It was San Quentin, and it was only  
11:05:59 4 10 years that I was there.  
11:06:01 5 Q Okay. So how come your bio says 20 years?  
11:06:05 6 A 'Cause whoever wrote it didn't realize I was  
11:06:08 7 transferred every year.  
11:06:09 8 Q Okay. Cumulatively or collectively, how many  
11:06:13 9 years have you served in prison?  
11:06:15 10 A Twenty-six?  
11:06:19 11 Q Twenty-six.  
11:06:20 12 Was that for one conviction?  
11:06:24 13 A No.  
11:06:25 14 Q Different convictions?  
11:06:26 15 A Yeah.  
11:06:26 16 Q How many years were you in prison?  
11:06:28 17 A Twenty-six.  
11:06:30 18 Q Sorry. What years were you in prison?  
11:06:33 19 A 1992. 1992.  
11:06:41 20 Q 1992 to?  
11:06:42 21 A To '97. And 2000 to 2020.  
11:06:49 22 Q What were you in prison for --  
11:06:51 23 A I don't remember.  
11:06:52 24 Q -- from 1992 to 1997?  
11:06:54 25 A I don't remember.

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11:06:55 1 Q You don't recall?

11:06:56 2 A Huh-uh.

11:06:57 3 Q Okay. And then from 2000 to 2020, what were

11:07:00 4 you in prison for?

11:07:02 5 A I don't remember. I think it was being Black.

11:07:05 6 Q Being Black. Okay.

11:07:17 7 A Can I have some water?

11:07:22 8 Q Sure.

11:07:26 9 A Thank you, brother.

11:07:32 10 Q What crimes were you convicted for, for the

11:07:34 11 last 20 years that you served in prison?

11:07:36 12 A I don't remember.

11:07:39 13 Q Do you remember what happened that caused you

11:07:41 14 to go to prison? What was the event?

11:07:44 15 A I don't remember.

11:07:45 16 Q Are you currently on probation?

11:07:49 17 A Not at all.

11:07:53 18 Q Is UTP a for-profit law firm?

11:07:57 19 A No.

11:07:58 20 Q Do you consider UTP to be a law firm?

11:08:01 21 A Yes.

11:08:02 22 Q Okay. Has UTP filed articles of incorporation

11:08:06 23 with the California Secretary of State?

11:08:08 24 A Yes.

11:08:10 25 Q What years?

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11:08:12 1 A 2016.

11:08:14 2 Q And every year since then?

11:08:16 3 A I don't know.

11:08:16 4 Q Is UTP a legal aid organization?

11:08:23 5 A We legally aid people; so you can call it what

11:08:26 6 you want.

11:08:26 7 Q Does UTP receive public or governmental grants

11:08:29 8 to support its operations?

11:08:31 9 A Not at all.

11:08:32 10 Q Not at all, or you don't know?

11:08:34 11 A I don't know.

11:08:37 12 Q Do you represent clients for free?

11:08:43 13 A Yes.

11:08:44 14 Q Okay. You never take money for representing

11:08:48 15 clients?

11:08:48 16 A Oh, yes.

11:08:49 17 Q Okay. And what prices do you charge?

11:08:54 18 A I don't know what to tell you. You'd have to

11:08:56 19 ask them.

11:08:56 20 Q Who is "them"?

11:08:57 21 A The other people besides me.

11:08:59 22 Q Who are the other people?

11:09:00 23 A The 15 to 20 staff people.

11:09:01 24 Q Okay. So who decides how much a case -- a

11:09:05 25 case or representation in a case costs?

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11:09:07 1 A I don't know.

11:09:09 2 Q As CEO of the company, you do not know how

11:09:11 3 much you guys charge for --

11:09:13 4 A I think it differs. Being a non-profit, it

11:09:16 5 probably differs.

11:09:16 6 Q Okay. What does that mean?

11:09:18 7 A It probably a sliding scale.

11:09:21 8 Q Okay. So what's at the lower end of the

11:09:23 9 sliding scale?

11:09:24 10 A Free.

11:09:25 11 Q Free. Okay.

11:09:26 12 What's at the higher end of the sliding scale?

11:09:28 13 A That, I don't know.

11:09:29 14 Q Do you have a fixed rate?

11:09:30 15 A I don't think they do. There's different

11:09:32 16 things.

11:09:32 17 Q Hourly rate?

11:09:34 18 A Do you understand post-conviction?

11:09:35 19 Q Yes.

11:09:36 20 A You do?

11:09:36 21 Q Yes.

11:09:37 22 A Okay. Is there a difference between the writ

11:09:39 23 and a writ of habeas corpus and a direct appeal?

11:09:43 24 Q I don't know. I don't run a law firm.

11:09:45 25 A You just said you understood.

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11:09:46 1 Q I don't run a law firm.

11:09:47 2 A Okay. I don't know either.

11:09:49 3 Q Okay. What percentage of your clients are

11:09:53 4 considered indigent?

11:09:55 5 A I don't know.

11:09:56 6 Q Is UTP registered with The State Bar of

11:09:57 7 California?

11:09:58 8 A Yes.

11:10:00 9 Q When did UTP first register with The State Bar

11:10:02 10 of California?

11:10:04 11 A Probably in 2017.

11:10:10 12 Q What is your involvement in UTP's legal

11:10:11 13 matters?

11:10:15 14 A I don't know.

11:10:17 15 Q While supporting UTP's legal matters, have you

11:10:19 16 ever been under the influence of any impairing drugs or

11:10:22 17 substances?

11:10:24 18 A Why? What? Say that again, please. I don't

11:10:27 19 understand your question.

11:10:28 20 Q Sure. While supporting UTP's legal matters --

11:10:30 21 A While supporting UTP's legal matters?

11:10:32 22 Q Uh-huh.

11:10:36 23 MS. DIXON: Objection. Relevance.

11:10:37 24 BY MS. HAYRAPETIAN:

11:10:37 25 Q -- have you ever been under the influence of

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11:10:39 1 any drugs or substances?

11:10:40 2 A When?

11:10:41 3 Q At any time when you were helping UTP?

11:10:45 4 MR. HAYDEN: You can answer.

11:10:46 5 THE WITNESS: I can answer?

11:10:47 6 MR. HAYDEN: Yeah.

11:10:47 7 THE WITNESS: No.

11:10:47 8 BY MS. HAYRAPETIAN:

11:10:48 9 Q Okay. Have you been involved in preparing

11:10:50 10 witnesses in this case for their depositions?

11:10:53 11 A Preparing witnesses for their depositions? I

11:10:57 12 don't -- no.

11:10:58 13 Q Okay. Did you communicate with Tory before

11:11:00 14 his deposition?

11:11:01 15 A I don't remember.

11:11:02 16 Q Did you help Tory prepare for his deposition?

11:11:04 17 A I don't remember.

11:11:06 18 Q Did you communicate with Sonstar before his

11:11:08 19 deposition?

11:11:08 20 A Who.

11:11:09 21 Q Sonstar?

11:11:09 22 A Who is that?

11:11:10 23 Q Tory's dad?

11:11:11 24 A Oh. I don't remember.

11:11:13 25 Q Did you advise Sonstar on what he should or

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11:11:16 1 should not say?

11:11:17 2 A I don't remember.

11:11:19 3 Q At the time UTP was representing Ms. Cooper in

11:11:21 4 this action, did you meet with Ms. Cooper to prepare for

11:11:24 5 her deposition?

11:11:25 6 A Who?

11:11:25 7 Q Ms. Cooper. Milagro Cooper.

11:11:28 8 A Did I meet with her?

11:11:29 9 Q Yes.

11:11:31 10 A Did I meet with her?

11:11:33 11 Q Correct.

11:11:34 12 A I don't even know her.

11:11:35 13 Q You don't know Ms. --

11:11:37 14 A I've never met her in person ever in life.

11:11:39 15 Q Okay. Do UT -- do UTP lawyers instruct you on

11:11:44 16 how to assist them on UTP cases?

11:11:48 17 A We already talked about that; so I'll just say

11:11:50 18 I don't remember.

11:11:51 19 Q Do UTP lawyers supervise your activities?

11:11:55 20 A I don't remember.

11:11:56 21 Q Do UTP lawyers provide you feedback on your

11:11:58 22 assignments?

11:11:59 23 A I don't remember.

11:12:00 24 Q Are you subject to an annual review of your

11:12:03 25 performance?



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11:12:04 1 A I don't remember.

11:12:05 2 Q Do you need to seek Mr. Hayden or another

11:12:08 3 lawyer's approval before speaking with clients?

11:12:12 4 A It's the same question three times over and

11:12:14 5 over. I don't remember.

11:12:17 6 Q Do you need to seek Mr. Hayden's or any

11:12:19 7 other lawyer's approval to speak to Tory?

11:12:24 8 A I don't remember.

11:12:27 9 Q Okay. Did you need to seek Mr. Hayden's or

11:12:30 10 another lawyer's approval to speak to Ms. Cooper?

11:12:33 11 A Who?

11:12:34 12 Q Ms. Cooper. Milagro Cooper.

11:12:36 13 A Who is that?

11:12:37 14 Q The defendant in this case -- Milagro Gramz.

11:12:39 15 A What is this case about?

11:12:42 16 Q Milagro Cooper is the defendant in this

11:12:44 17 action --

11:12:45 18 A Uh-huh.

11:12:46 19 Q -- brought by Ms. Pete.

11:12:47 20 A Okay. Do you know what it's about?

11:12:52 21 Q Yes. Unfortunately, it's not my deposition

11:12:54 22 yet today.

11:12:55 23 A Well, I'm just trying to find out. Go ahead.

11:12:58 24 Q Okay. So this is a case you took on; right?

11:13:04 25 A I think so, yeah.

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11:13:05 1 Q Okay. So you don't know what the case is  
11:13:06 2 about, but you took it on?  
11:13:08 3 A I don't know what it's about.  
11:13:09 4 Q Okay. You just took it on 'cause Tory told  
11:13:11 5 you to?  
11:13:12 6 A 'Cause Tory told me to? So now if you  
11:13:13 7 start --  
11:13:13 8 Q Yeah.  
11:13:14 9 MR. HAYDEN: Objection. Speculation.  
11:13:15 10 THE WITNESS: -- if you start, I start; right?  
11:13:16 11 MR. HAYDEN: I said, "Objection.  
11:13:17 12 Speculation."  
11:13:19 13 BY MS. HAYRAPETIAN:  
11:13:20 14 Q Can you answer my question?  
11:13:22 15 A I don't know what you are talking about.  
11:13:24 16 Q Okay. Did you need to seek Mr. Hayden's or  
11:13:29 17 another lawyer's approval before speaking to Ms. Cooper?  
11:13:34 18 A I don't remember.  
11:13:35 19 Q Okay. You are aware that the State of  
11:13:36 20 California charged Tory with three felonies for shooting  
11:13:40 21 Ms. Pete on July 12th, 2020; correct?  
11:13:44 22 A For doing what? Who shot her? Is that what  
11:13:48 23 you are saying?  
11:13:49 24 Q Actually, my question was: You are aware that  
11:13:51 25 the state of California charged Tory with three felonies

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11:13:55 1 for shooting Ms. Pete on July 12th, 2020?

11:13:58 2 A I don't remember.

11:13:58 3 Q You don't remember. Okay.

11:14:00 4 A Huh-uh.

11:14:01 5 Q And do you remember that Tory was convicted of

11:14:03 6 one felony assault with a semi-automatic firearm?

11:14:07 7 A Semi-automatic?

11:14:08 8 Q Semi-automatic. Sorry.

11:14:09 9 A Automatic, oh. I don't remember.

11:14:11 10 Q And do you remember if Tory was convicted of

11:14:15 11 illegal possession of a firearm?

11:14:18 12 A Was he?

11:14:20 13 Q And Tory was convicted of negligent discharge

11:14:23 14 of a firearm; correct?

11:14:25 15 A I don't know.

11:14:25 16 Q The jury unanimously found Tory guilty of all

11:14:29 17 three felony accounts; correct?

11:14:30 18 A I don't know.

11:14:31 19 Q Tory was --

11:14:33 20 A They unanimously found him? That's what you

11:14:36 21 are saying?

11:14:36 22 Q Yes.

11:14:37 23 A Is it? Wow.

11:14:38 24 Q You don't know?

11:14:38 25 A I didn't know.

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11:14:39 1 Q Okay. It's not a case you took on?

11:14:41 2 A I don't know his charges.

11:14:42 3 Q Okay. Tory was sentenced to 10 years in

11:14:45 4 prison as a result of his felony convictions; correct?

11:14:49 5 A I think so.

11:14:50 6 Q And Tory currently remains in prison, serving

11:14:52 7 that same sentence?

11:14:53 8 A He is still there?

11:14:59 9 Q Do you know? You don't know?

11:14:59 10 A What?

11:15:00 11 Q If Tory is still in prison?

11:15:03 12 A I don't know where he is at.

11:15:04 13 Q Okay. So he might be out of prison?

11:15:06 14 A He could be.

11:15:08 15 Q Okay.

11:15:08 16 A I've been in here with you.

11:15:10 17 Q All right.

11:15:10 18 Tory was proven guilty beyond a reasonable

11:15:13 19 doubt by a jury of his peers; correct?

11:15:16 20 A Jury of his peers?

11:15:18 21 Q Yep.

11:15:19 22 MS. DIXON: Objection. Asked and answered.

11:15:20 23 And argumentative.

11:15:24 24 THE WITNESS: What she said.

11:15:25 25 BY MS. HAYRAPETIAN:

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11:15:26 1 Q What did she say? I couldn't hear.

11:15:29 2 A You couldn't?

11:15:29 3 Q No.

11:15:30 4 A Oh, okay.

11:15:34 5 Q Do you have an answer to my question?

11:15:36 6 A What was your question?

11:15:37 7 MS. HAYRAPETIAN: Can you read it back.

11:15:38 8 (The following record was read:

11:15:38 9 "QUESTION: All right. Tory was proven

11:15:38 10 guilty beyond a reasonable doubt by a jury

11:15:38 11 of his peers; correct?")

11:15:51 12 THE WITNESS: Were you asking me that?

11:15:52 13 BY MS. HAYRAPETIAN:

11:15:53 14 Q Uh-huh.

11:15:54 15 A A jury of his peers. That's big.

11:15:59 16 Q Yes-or-no question.

11:16:00 17 A What was it?

11:16:02 18 Q Do you have an answer?

11:16:04 19 A To was he convicted by his peers? That was

11:16:08 20 the question?

11:16:08 21 Q Yeah, that was the question.

11:16:09 22 A Nah. I don't think he was convicted by his

11:16:11 23 peers.

11:16:12 24 Q Okay. Who do you think he was convicted by?

11:16:16 25 A Peoples.

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11:16:16 1 Q What peoples?

11:16:17 2 A Peoples that was in the courtroom.

11:16:20 3 Q Okay. You were at Tory's criminal trial;

11:16:24 4 correct?

11:16:25 5 A Sometimes.

11:16:26 6 Q Sometimes.

11:16:27 7 You weren't being paid to attend Tory's trial,

11:16:28 8 were you?

11:16:32 9 A No.

11:16:34 10 Q Okay. You weren't working for any of the

11:16:36 11 lawyers representing Tory; right?

11:16:39 12 A I don't know.

11:16:40 13 Q So you were attending the trial as his friend

11:16:42 14 of Tory?

11:16:43 15 A I don't know.

11:16:45 16 Q You knew Tory well before his trial; correct?

11:16:47 17 A I don't remember.

11:16:48 18 Q Do you remember when you met Tory?

11:16:51 19 A No.

11:16:52 20 Q How -- how long have you known him?

11:16:53 21 A I don't know.

11:16:53 22 Q Best estimate?

11:16:56 23 A A lot of days.

11:16:57 24 Q Okay. So I'm entitled to your best estimate

11:16:59 25 which is different from a guess.

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11:17:01 1 Do you know the difference between an estimate  
11:17:02 2 and a guess?  
11:17:03 3 A Three days.  
11:17:04 4 Q You've known Tory for three days?  
11:17:06 5 A Yep. For sure. I've known him definitely for  
11:17:08 6 three days.  
11:17:09 7 Q Okay. Have you known Tory for longer than  
11:17:10 8 three days?  
11:17:11 9 A Yes.  
11:17:12 10 Q How long have you known him?  
11:17:14 11 A I don't remember.  
11:17:14 12 Q Ten years?  
11:17:20 13 A I don't remember.  
11:17:21 14 Q Could it be 10 years? Best estimate?  
11:17:25 15 A I don't know.  
11:17:28 16 Q More than five years you've known Tory?  
11:17:34 17 A I don't know.  
11:17:35 18 Q Okay. More than two years you've known Tory?  
11:17:37 19 A Yes.  
11:17:38 20 Q More than three years?  
11:17:39 21 A I don't know.  
11:17:41 22 Q You knew him at the time of the shooting;  
11:17:44 23 correct?  
11:17:44 24 A I don't know when the shooting happened.  
11:17:46 25 Q July 12th, 2020.

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11:17:48 1 A I don't remember.

11:17:49 2 Q Okay. So you knew him at trial and that was

11:17:54 3 2022.

11:17:55 4 A Was it?

11:17:55 5 Q Yes. How did you end up going to Tory's

11:17:58 6 trial?

11:17:58 7 A I drove.

11:17:59 8 Q You drove. Great.

11:18:02 9 How did you end up knowing Tory well enough to

11:18:06 10 end up going to his trial to support him?

11:18:11 11 A I -- I don't know if I went there to support

11:18:13 12 him. I went to the trial. I don't know how.

11:18:17 13 Q Okay. Well, if you were there to support him,

11:18:19 14 what were you there for?

11:18:22 15 A I don't remember.

11:18:23 16 Q Tory was sitting on UTP's Advisory Board;

11:18:30 17 correct?

11:18:32 18 A Sure.

11:18:33 19 Q Including at the time of the trial?

11:18:36 20 A I don't remember.

11:18:38 21 Q Tory was also contributing financially to the

11:18:40 22 organization; correct?

11:18:42 23 A I don't remember.

11:18:44 24 MS. HAYRAPETIAN: I'd like to mark as

11:18:45 25 Exhibit Number 77. This is Tab 5.



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11:19:28 1 MS. DIXON: The previous was 76.

11:19:29 2 MS. HAYRAPETIAN: Yeah.

11:19:47 3 (Exhibit 77 was marked for identification.)

11:19:47 4 BY MS. HAYRAPETIAN:

11:19:48 5 Q Okay. So this is a Instagram post from Unite  
11:19:57 6 the People. And I'll read the caption of the post first  
11:20:04 7 which states, "Hello, my name is Ceasar McDowell, CEO of  
11:20:08 8 Unite the People. As you may know, Grammy  
11:20:10 9 Award-nominated artist and philanthropist Tory Lanez is  
11:20:13 10 a three-year member of the advisory board of our  
11:20:15 11 organization. As a whole, we stand for fighting against  
11:20:19 12 social injustices, including the prosecution of innocent  
11:20:21 13 people. As you also know, Tory is currently on trial  
11:20:24 14 and being egregiously accused of something he did not  
11:20:27 15 do."

11:20:29 16 What basis do you have for claiming Tory's  
11:20:31 17 innocence?

11:20:34 18 A Are you talking to me?

11:20:35 19 Q Yes.

11:20:36 20 A What basis do I have for what?

11:20:37 21 Q Claiming Tory's innocent. Or, quote, "being  
11:20:41 22 egregiously accused of something he did not do."

11:20:44 23 What's your basis for that statement?

11:20:46 24 A The basis for that statement? It said what  
11:20:50 25 again? That he was egregiously -- where is that? Let

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11:20:54 1 me read that to you. Where is it at?

11:20:56 2 Q It's the last line of your Instagram caption.

11:21:00 3 A Last line --

11:21:01 4 Q On the right side.

11:21:02 5 A "Tory is currently on trial and being

11:21:07 6 egregiously accused of something he did not do." I

11:21:11 7 stand by that.

11:21:12 8 Q Okay. On what basis?

11:21:14 9 A On I believe he was -- let me read it again.

11:21:16 10 "Currently on trial for being egregiously accused of

11:21:21 11 something he did not do." On that basis.

11:21:24 12 Q Okay. And how do you know he did not do it?

11:21:29 13 A 'Cause I know he did not do it.

11:21:32 14 Q Because he told you he did not do it?

11:21:33 15 A Because I know he did not do it.

11:21:35 16 Q And how did you come to know he did not do it?

11:21:38 17 A 'Cause that's what I believe.

11:21:39 18 Q Okay. And why do you believe that?

11:21:42 19 A Because he is a great guy.

11:21:43 20 Q Okay. Keeping -- I'm going to continue

11:21:49 21 reading. [As read] Keeping in line with our common

11:21:52 22 goals, mission, and reform efforts, all areas that Tory

11:21:55 23 has avidly aided Unite the People Inc. --

11:21:59 24 A Where were you reading that? I don't see

11:22:00 25 that.

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11:22:01 1 Q This is in the --

11:22:02 2 A The black?

11:22:02 3 Q -- post on the left. Yes. Correct. On the  
11:22:06 4 black.

11:22:06 5 [As read] So Tory avidly aided Unite the  
11:22:09 6 People Inc. physically and monetarily. We would love  
11:22:11 7 for all of you, his friends, family, and fans, to rally  
11:22:14 8 and show a united front to protest these charges.

11:22:21 9 And then it says, "Sincerely, Ceasar McDowell,  
11:22:24 10 CEO," and some of your information.

11:22:27 11 Do you recall making that post?

11:22:29 12 A I don't remember.

11:22:37 13 Q Any reason to doubt these are your words?

11:22:39 14 A I would absolutely doubt that these are my  
11:22:41 15 words.

11:22:44 16 Q You would, or you wouldn't?

11:22:45 17 A I would.

11:22:46 18 Q You would?

11:22:46 19 A Uh-huh.

11:22:47 20 Q So someone else just went on Unite the  
11:22:51 21 People's Instagram account and posted on your behalf?

11:22:55 22 A No. I just don't know if these are my exact  
11:22:57 23 words. I don't know where you got it from. I'm looking  
11:22:59 24 at this piece of paper but --

11:23:02 25 Q Okay. Well, you are welcome to pull out your

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11:23:04 1 Instagram and go to this post and compare it.

11:23:08 2 Do you want to do that, if you don't believe

11:23:10 3 me? We have time. We can do it on a break.

11:23:13 4 A We can do it all day.

11:23:14 5 Q Yeah.

11:23:14 6 A Hey, I have nothing to do today.

11:23:16 7 Q Same. I'm so glad.

11:23:16 8 A You feel me. That's what I'm talking about.

11:23:16 9 Yeah.

11:23:17 10 You want to do lunch after this?

11:23:19 11 Q Actually, we ordered lunch so, yeah.

11:23:21 12 A Did you?

11:23:21 13 Q Yeah, yeah.

11:23:21 14 A I would not eat nothing from you people.

11:23:23 15 Q That's unfortunate.

11:23:24 16 A Yeah.

11:23:24 17 Q I'm not making it. But okay.

11:23:29 18 So this is a post from Unite the People, and

11:23:34 19 you believe Tory is innocent.

11:23:35 20 Did anyone else at UTP attend Tory's trial?

11:23:41 21 A Yeah. I'm sure they did.

11:23:43 22 Q Do you remember who?

11:23:44 23 A No.

11:23:44 24 Q Was Mr. Hayden there?

11:23:45 25 A I don't remember.

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11:23:47 1 Q You --

11:23:48 2 A He is right here.

11:23:50 3 MR. HAYDEN: I can't answer. You have to

11:23:51 4 answer.

11:23:52 5 THE WITNESS: Oh, okay.

11:23:52 6 I don't remember.

11:23:52 7 BY MS. HAYRAPETIAN:

11:23:53 8 Q Did UTP help out with Tory's defense before or

11:23:56 9 during the trial?

11:23:57 10 A I don't remember.

11:23:58 11 Q Did UTP begin -- when did UTP begin

11:24:00 12 representing Tory?

11:24:02 13 A That, I don't remember.

11:24:04 14 Q The other stuff you did remember.

11:24:06 15 You just weren't telling me?

11:24:07 16 A Which stuff?

11:24:08 17 Q Well, I just asked did UTP -- "when did UTP

11:24:11 18 begin representing Tory?"

11:24:12 19 And you said, "That, I don't remember."

11:24:14 20 A That, I don't remember.

11:24:15 21 Q So the other stuff you remembered?

11:24:16 22 A No. I said what I don't remember.

11:24:18 23 We got all day; right?

11:24:20 24 Q Yeah.

11:24:20 25 A Let's do it.

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11:24:21 1 Q All day.

11:24:22 2 A Let's do it. I'm with it.

11:24:27 3 Q Okay. Did you attend every day of Tory's

11:24:30 4 trial?

11:24:31 5 A I don't remember.

11:24:31 6 Q Did you attend most days?

11:24:32 7 A I don't remember.

11:24:33 8 Q You met Ms. Cooper in person at Tory's

11:24:35 9 criminal trial; correct?

11:24:37 10 A I don't remember. I don't think so.

11:24:39 11 Q Okay. So if Ms. Cooper testified a few days

11:24:44 12 ago that she, quote, "I met Ceasar at trial, at the

11:24:49 13 trial of Daystar Peterson."

11:24:54 14 A She could be right. I just don't remember.

11:24:55 15 Q Okay. Was this the -- sorry.

11:25:04 16 Do you know who Ms. Cooper is, sitting here

11:25:06 17 today?

11:25:09 18 A I don't see her.

11:25:11 19 Q But you know her?

11:25:12 20 A Who?

11:25:13 21 Q Ms. Cooper.

11:25:13 22 A No.

11:25:14 23 Q You don't know her?

11:25:16 24 A No.

11:25:16 25 Q You don't remember meeting her at trial, but

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11:25:18 1 she could have -- she could be --

11:25:20 2 A She could have. She could be. She could be,  
11:25:21 3 right.

11:25:21 4 Q And do you think that was the first time you  
11:25:23 5 would have met her in person?

11:25:26 6 A I don't think -- I don't think I met her in  
11:25:27 7 person. I don't remember. But there was a lot of  
11:25:31 8 people at trial.

11:25:31 9 Did you go to the trial?

11:25:33 10 Q No.

11:25:33 11 A Oh. You weren't in criminal court?

11:25:40 12 Q I'm sorry. What did you say?

11:25:41 13 A You weren't allowed there because you are not  
11:25:44 14 a criminal attorney.

11:25:45 15 Q Actually, that's not the requirement for being  
11:25:47 16 in court. You -- you were there, and you aren't a  
11:25:49 17 criminal attorney.

11:25:50 18 A Feel me. But I'm there.

11:25:54 19 Q Okay.

11:25:57 20 A You have nice hair too.

11:25:58 21 Q Thank you. I appreciate it.

11:25:59 22 A You are welcome.

11:26:01 23 Q Did you know Ms. Cooper prior to trial?

11:26:02 24 A Who?

11:26:03 25 Q Ms. Cooper, Milagro Cooper?

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11:26:04 1 A The person I said I already said I didn't  
11:26:06 2 know.

11:26:07 3 Q I'm just trying to see if your recollection  
11:26:08 4 has been refreshed at any point throughout this day so  
11:26:11 5 far.

11:26:11 6 A Okay. Cool, cool, cool. I don't remember.

11:26:13 7 Q Okay. Do you have Ms. Cooper's phone number?

11:26:19 8 A Who?

11:26:20 9 Q Ms. Cooper's phone number?

11:26:21 10 A I don't know.

11:26:21 11 Q You don't know?

11:26:22 12 A I don't know.

11:26:23 13 Q Okay. How did you end up taking on  
11:26:28 14 Ms. Cooper's case?

11:26:29 15 A I don't remember.

11:26:30 16 Q Did you exchange phone numbers with  
11:26:38 17 Ms. Cooper?

11:26:39 18 A I don't remember.

11:26:40 19 Q Did you exchange any documents or notes with  
11:26:42 20 Ms. Cooper during Tory's trial?

11:26:44 21 A I don't remember.

11:26:45 22 Q At any point during the trial, did you convey  
11:26:47 23 any information to Ms. Cooper?

11:26:49 24 A I do not remember.

11:26:51 25 Q At any point during the trial, did you



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11:26:52 1 communicate any information to Ms. Cooper at the request  
11:26:55 2 of Tory?

11:26:56 3 A I don't remember.

11:26:58 4 Q How about anyone else in his circle?

11:27:00 5 A I don't remember.

11:27:00 6 Q What information did you communicate to  
11:27:04 7 Ms. Cooper during Tory's trial at his request or that of  
11:27:07 8 anyone in his circle?

11:27:09 9 MR. HAYDEN: Objection. Speculation.

11:27:11 10 BY MS. HAYRAPETIAN:

11:27:11 11 Q You don't remember that either?

11:27:12 12 A No.

11:27:13 13 Q Okay. But you did communicate information  
11:27:19 14 from Tory?

11:27:20 15 MR. HAYDEN: Objection. Speculation.

11:27:22 16 THE WITNESS: I don't remember.

11:27:22 17 BY MS. HAYRAPETIAN:

11:27:23 18 Q So you don't --

11:27:26 19 MS. DIXON: Objection. Assuming facts --

11:27:32 20 THE COURT REPORTER: I can't -- I can't hear  
11:27:32 21 her.

11:27:32 22 Can you repeat that, please?

11:27:30 23 MS. DIXON: Assuming facts not in evidence.

11:27:33 24 BY MS. HAYRAPETIAN:

11:27:34 25 Q So you don't remember what information you

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11:27:39 1 communicated to Ms. Cooper from Tory?

11:27:42 2 MR. HAYDEN: Objection. Same objections.

11:27:43 3 THE WITNESS: Are you insinuating that I did?

11:27:45 4 BY MS. HAYRAPETIAN:

11:27:46 5 Q I'm asking --

11:27:47 6 A I just told you that I don't remember, but

11:27:49 7 you're insinuating that I did. I said, "I don't

11:27:50 8 remember."

11:27:50 9 Q Actually, sir, I wasn't done with my question;

11:27:52 10 so --

11:27:52 11 A Actually, I answered.

11:27:54 12 MR. HAYDEN: Wait until she's finished.

11:27:55 13 BY MS. HAYRAPETIAN:

11:27:56 14 Q I am trying to get clarification on what it is

11:27:58 15 you don't remember.

11:27:59 16 A Oh. Okay.

11:27:59 17 Q On --

11:28:00 18 A It seems like you are trying to say I did

11:28:02 19 something. That's what it seems like to me.

11:28:05 20 Q Well --

11:28:06 21 A Okay.

11:28:06 22 Q -- if you let me finish my question --

11:28:08 23 A Sure.

11:28:08 24 Q -- I think we can get to where we need to get.

11:28:10 25 A Which -- which one, though? You just

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11:28:11 1 finished, and I was still answering. Then you started  
11:28:14 2 again, while I was still answering, but you said you are  
11:28:16 3 not finished.

11:28:17 4 Q So what -- what is it that you don't remember?

11:28:21 5 A Anything.

11:28:21 6 Q You don't remember if you gave information?

11:28:28 7 Or you know you didn't give information? Or you don't  
11:28:31 8 remember what information you gave?

11:28:34 9 MS. DIXON: Objection. It's a compound  
11:28:36 10 question. Vague and ambiguous.

11:28:40 11 THE WITNESS: Are you done?

11:28:40 12 BY MS. HAYRAPETIAN:

11:28:41 13 Q I'm done.

11:28:42 14 A Oh, okay. I don't remember.

11:28:43 15 Q Tory is UTP's most well-known client; correct?

11:28:55 16 MR. HAYDEN: Objection. Speculation.

11:28:59 17 THE WITNESS: Are you done? I don't know.

11:29:01 18 BY MS. HAYRAPETIAN:

11:29:02 19 Q You don't know?

11:29:03 20 A Huh-uh.

11:29:04 21 Q Do you have any clients that are more  
11:29:12 22 well-known than Tory?

11:29:14 23 MR. HAYDEN: Objection. Speculation.

11:29:15 24 Relevance.

11:29:18 25 THE WITNESS: I don't remember.

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11:29:18 1 BY MS. HAYRAPETIAN:

11:29:19 2 Q Tory attracts significant media coverage and  
11:29:21 3 publicity for UTP; correct?

11:29:23 4 MR. HAYDEN: Objection. Speculation.

11:29:25 5 THE WITNESS: I don't know.

11:29:26 6 BY MS. HAYRAPETIAN:

11:29:26 7 Q Potential clients reach out to UTP because  
11:29:28 8 they know UTP represents Tory; correct?

11:29:30 9 MR. HAYDEN: Objection. Speculation.

11:29:33 10 THE WITNESS: I don't know.

11:29:33 11 BY MS. HAYRAPETIAN:

11:29:34 12 Q UTP has donors who contribute financially  
11:29:36 13 because of Tory; correct?

11:29:38 14 MR. HAYDEN: Objection. Speculation.  
11:29:39 15 Assuming facts not in evidence.

11:29:41 16 THE WITNESS: I don't know.

11:29:41 17 BY MS. HAYRAPETIAN:

11:29:42 18 Q In fact, donors give with a specific intent of  
11:29:45 19 supporting the Free Tory Movement; correct?

11:29:48 20 MR. HAYDEN: Same objections.

11:29:50 21 THE WITNESS: I don't know.

11:29:50 22 BY MS. HAYRAPETIAN:

11:29:51 23 Q UTP racks up the highest costs and fees in  
11:29:53 24 representing Tory?

11:29:54 25 MR. HAYDEN: Same objections.

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11:29:57 1 THE WITNESS: Say that again. Just let me  
11:29:58 2 hear you say it again because I don't -- I didn't hear  
11:30:00 3 it. Go ahead.  
11:30:01 4 BY MS. HAYRAPETIAN:  
11:30:02 5 Q UTP racks up the highest costs and fees in  
11:30:04 6 representing Tory; correct?  
11:30:06 7 A UTP -- I want you to explain that, please.  
11:30:08 8 Q Okay. Let's break it down.  
11:30:10 9 A Let's break it down.  
11:30:11 10 Q UTP --  
11:30:12 11 A Uh-huh.  
11:30:12 12 Q -- racks up --  
11:30:13 13 A What?  
11:30:13 14 Q -- its highest costs and fees in representing  
11:30:17 15 Tory.  
11:30:18 16 A No.  
11:30:19 17 Q No. What -- what case brings you in more  
11:30:21 18 money than Tory's?  
11:30:23 19 A Damn near everyone.  
11:30:24 20 Q Really?  
11:30:25 21 A Yeah.  
11:30:25 22 Q Why is that?  
11:30:28 23 A Because it's a lot more of them.  
11:30:31 24 Q Okay. But I'm talking about what's your most  
11:30:36 25 expensive case? The one that brings you in the most

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11:30:40 1 money?

11:30:41 2 A I don't know.

11:30:42 3 Q But it's not Tory's?

11:30:43 4 A I don't know.

11:30:46 5 Q Okay. Tory has -- Tory contributes

11:30:52 6 financially to UTP outside of his own legal fees;

11:30:54 7 correct?

11:30:54 8 A I don't know.

11:30:56 9 Q Okay. Tory has helped pay the legal fees of

11:30:58 10 other clients represented by UTP; correct?

11:31:01 11 A I don't know.

11:31:02 12 Q And he has also help pay the fees for

11:31:05 13 Ms. Cooper; correct?

11:31:06 14 MR. HAYDEN: Objection. Speculation.

11:31:11 15 THE WITNESS: What was the question? I was

11:31:12 16 coughing. I'm sorry.

11:31:12 17 BY MS. HAYRAPETIAN:

11:31:13 18 Q No problem.

11:31:14 19 Tory has also helped pay the fees for

11:31:17 20 Ms. Cooper; correct?

11:31:18 21 A No.

11:31:20 22 Q That one, you remember?

11:31:22 23 A What did I say?

11:31:23 24 Q You said, "No."

11:31:23 25 A Then I must have remembered.

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11:31:26 1 Q Shocked. I know. You remembered something.

11:31:28 2 A I must have remembered. I must have

11:31:29 3 remembered.

11:31:31 4 MS. DIXON: Objection. That's argumentative.

11:31:32 5 MS. HAYRAPETIAN: Is it?

11:31:32 6 MS. DIXON: Yeah. The way you are talking

11:31:35 7 with him is argumentative.

11:31:37 8 MS. HAYRAPETIAN: Thank you.

11:31:39 9 THE WITNESS: I agree with her.

11:31:40 10 BY MS. HAYRAPETIAN:

11:31:40 11 Q Let's see how long it is you are going to

11:31:48 12 agree with her for. Just hang out. Stay with me.

11:31:54 13 A I'm here. Let's do it.

11:31:55 14 Q Come back to me when we get on page 50 of my

11:31:58 15 outline.

11:31:59 16 A Sure. Let's do it. Let's do it.

11:32:00 17 Let me know when we're at page 50, please.

11:32:03 18 Q I will.

11:32:03 19 A All right.

11:32:04 20 Q Okay. So according to your website,

11:32:09 21 Tory Lanez stopped by the Unite the People office in

11:32:12 22 Downtown Long Beach and donated \$50,000 to pay off the

11:32:18 23 legal fees for 30 families.

11:32:20 24 Do you recall that?

11:32:22 25 A I don't remember.

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11:32:23 1 Q Okay.

11:32:24 2 MS. HAYRAPETIAN: Let's mark Exhibit

11:32:25 3 Number 78, and we're going to pull up Tab 22, please.

11:32:32 4 (Exhibit 78 was marked for identification.)

11:33:04 5 MS. HAYRAPETIAN: Okay. Let's head towards

11:33:05 6 page 3 which has -- and I'll just represent this is a

11:33:15 7 screen grab from UTP's website. The capture link is all

11:33:21 8 on page 1. And on page 3, there is an article link

11:33:28 9 about Tory Lanez donating \$50,000.

11:33:40 10 BY MS. HAYRAPETIAN:

11:33:40 11 Q So who are the clients Tory helped pay legal

11:33:43 12 fees for?

11:33:46 13 Do you want to go to page 3 so you can follow

11:33:48 14 along?

11:33:49 15 A It's my website.

11:33:52 16 Q Oh, you remember?

11:33:53 17 A It's my website.

11:33:54 18 Q Awesome. Okay.

11:33:55 19 So we just read Tory Lanez stopped by, donated

11:33:59 20 \$50,000 to pay off the legal fees for 30 families.

11:34:04 21 A That's what it says.

11:34:05 22 Q Yeah. Which clients of yours did Tory pay

11:34:10 23 fees for?

11:34:11 24 A I don't remember.

11:34:13 25 Q Okay. But that included Ms. Cooper; right?



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11:34:16 1 MR. HAYDEN: Objection. Speculation.  
11:34:17 2 Assuming facts not in evidence.  
11:34:23 3 THE WITNESS: You are funny.  
11:34:23 4 BY MS. HAYRAPETIAN:  
11:34:24 5 Q Thanks.  
11:34:27 6 A You are trying. You are trying.  
11:34:30 7 MS. DIXON: Just a point of clarification,  
11:34:30 8 there's no date on this. And he apparently stopped by  
11:34:33 9 in person; so he wasn't incarcerated. He has been  
11:34:37 10 incarcerated during all times pending this -- this  
11:34:41 11 particular lawsuit; so I'm going to object based on  
11:34:43 12 relevance.  
11:34:44 13 MS. HAYRAPETIAN: Okay. Well, your objections  
11:34:46 14 are noted, and they're improper because they're speaking  
11:34:49 15 objections; so stop coaching the witness from the left  
11:34:51 16 side of the room. And if actually --  
11:34:53 17 MS. DIXON: I'm not coaching the witness. I  
11:34:54 18 don't know what the date is.  
11:34:55 19 MS. HAYRAPETIAN: Let me speak. Ronda.  
11:34:56 20 MS. DIXON: If he was out of custody,  
11:34:57 21 obviously, it's not relevant because he was in custody  
11:34:59 22 the whole time.  
11:35:00 23 MS. HAYRAPETIAN: Ronda, let me -- let me  
11:35:01 24 finish. I don't interrupt you when you are speaking,  
11:35:03 25 please.

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11:35:03 1 MS. DIXON: Objection. Relevance.

11:35:04 2 MS. HAYRAPETIAN: I don't interrupt you when

11:35:05 3 you are speaking. Please, provide me the same courtesy

11:35:09 4 and respect.

11:35:10 5 And, if you were to look on page 3, on the

11:35:12 6 left side of the screenshot, from "TMZ," a screenshot,

11:35:15 7 that was posted by UTP on its website. The date very

11:35:20 8 clearly states "May 17, 2023." And I think if you

11:35:25 9 looked back, he was not in prison.

11:35:27 10 MS. DIXON: He was incarcerated.

11:35:28 11 MS. HAYRAPETIAN: Was he?

11:35:29 12 MS. DIXON: Yes.

11:35:29 13 MS. HAYRAPETIAN: Okay. Great. So --

11:35:30 14 MS. DIXON: I know for a fact because I

11:35:31 15 visited him during that time. He was incarcerated.

11:35:33 16 Since the time of his -- the time that he got convicted,

11:35:38 17 which was in December of 2022, he was -- he was

11:35:41 18 incarcerated on May of 2023.

11:35:44 19 MS. HAYRAPETIAN: Okay. Great. So maybe you

11:35:45 20 want to check to see when his sentencing hearing was.

11:35:48 21 And --

11:35:50 22 MS. DIXON: I know when it was.

11:35:50 23 MS. HAYRAPETIAN: Okay.

11:35:56 24 MS. DIXON: I was --

11:35:56 25 MS. HAYRAPETIAN: Great. So --

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11:35:56 1 (The Court Reporter requested clarification.)  
11:35:57 2 MS. DIXON: I was there.  
11:35:58 3 MS. HAYRAPETIAN: Move to strike.  
11:36:00 4 And please refrain from any more talking  
11:36:04 5 objections to coach the witness.  
11:36:08 6 MS. DIXON: I'm not coaching the witness. I'm  
11:36:09 7 just giving you some information that you must not have,  
11:36:12 8 because obviously he was incarcerated throughout the  
11:36:15 9 entire pendency of this particular motion. This  
11:36:19 10 complaint that you have right now, he has been  
11:36:21 11 incarcerated the whole time.  
11:36:23 12 MS. HAYRAPETIAN: Okay. Well --  
11:36:24 13 MS. DIXON: So for him to pay for my client --  
11:36:25 14 you are -- you are saying he is paying my client's fees  
11:36:27 15 in person. He couldn't have done that because he was  
11:36:30 16 incarcerated.  
11:36:31 17 MS. HAYRAPETIAN: That's not actually what I  
11:36:32 18 said but okay.  
11:36:33 19 MS. DIXON: That's what you are getting at.  
11:36:34 20 BY MS. HAYRAPETIAN:  
11:36:35 21 Q How much -- how much has Tory paid UTP in  
11:36:36 22 legal fees, in total?  
11:36:38 23 A I don't know.  
11:36:39 24 Q How much has Tory paid UTP in donations or  
11:36:41 25 voluntary contributions?

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11:36:43 1 A I don't know.

11:36:44 2 Q What other items of value has Tory provided

11:36:47 3 UTP?

11:36:48 4 A I don't know.

11:36:49 5 Q What is the total amount of money Tory has

11:36:52 6 paid UTP?

11:36:53 7 A I don't know.

11:36:53 8 Q On April 7, 2025, Tory's father,

11:37:01 9 Mr. Sonstar Peterson, testified during his deposition

11:37:08 10 in this case, quote, "Tory is on the board of an

11:37:12 11 organization right here in California. I believe their

11:37:16 12 office is run out of Long Beach, and it's -- what's it

11:37:20 13 called -- Unite the People. He was on the board

11:37:23 14 fighting for criminal justice for the longest time, so

11:37:26 15 whatever he has paid has come directly out of his own

11:37:29 16 pocket. In fact, I'm sure you've seen video footage of

11:37:33 17 either Unite the People talking about that. According

11:37:37 18 to Sonstar, Tory's dad, Tory is central to various UTP

11:37:41 19 programs including the, quote, 'Hands of God Project'."

11:37:46 20 That's correct; right? All that is correct?

11:37:48 21 A I don't remember.

11:37:48 22 MR. HAYDEN: Objection. Narrative. Compound.

11:37:51 23 BY MS. HAYRAPETIAN:

11:37:52 24 Q Tory has supported UTP, quote, "directly out

11:37:54 25 of his pocket"; correct?

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11:37:55 1 A I don't know.

11:37:56 2 MR. HAYDEN: Objection. Speculation.

11:37:57 3 BY MS. HAYRAPETIAN:

11:37:58 4 Q Any reason to think Tory's dad is lying under

11:38:01 5 oath?

11:38:02 6 MR. HAYDEN: Objection. Speculation.

11:38:03 7 THE WITNESS: I don't remember.

11:38:03 8 BY MS. HAYRAPETIAN:

11:38:06 9 Q Tory's also sat on the board of UTP; correct?

11:38:09 10 A I don't remember.

11:38:10 11 Q How long has Tory been on the board of UTP?

11:38:14 12 A I just said, "I don't remember."

11:38:16 13 Q How did Tory become a UTP board member?

11:38:19 14 A I don't remember.

11:38:20 15 Q Is being on the board the same as being an

11:38:24 16 advisory member?

11:38:26 17 A I don't remember.

11:38:27 18 Q You don't know, as the CEO of your own

11:38:29 19 company, if being on the board is the same as being --

11:38:33 20 A You don't mind if I roll one of these while we

11:38:35 21 talk; right?

11:38:36 22 Q I can't control you, unfortunately.

11:38:38 23 A Unfortunately. You would like to control me?

11:38:46 24 Q Okay. Next question.

11:38:49 25 A Let's do it. Seven hours. Love it.

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11:38:54 1 Q How did Tory advise UTP?

11:38:58 2 A I don't know.

11:38:59 3 Q What does Tory do as an advisory member?

11:39:02 4 A I don't know.

11:39:03 5 Q Is Tory compensated for being an advisory

11:39:05 6 member?

11:39:06 7 A I don't know.

11:39:07 8 Q So Tory funds UTP, he advises UTP, he solicits

11:39:19 9 donations for UTP, and he attracts new clients for UTP.

11:39:24 10 MS. DIXON: Objection. Assumes facts not in

11:39:25 11 evidence. And calls for speculation.

11:39:26 12 BY MS. HAYRAPETIAN:

11:39:26 13 Q And raises --

11:39:28 14 MS. HAYRAPETIAN: Can you -- Ronda, I'm in the

11:39:30 15 middle of my question. Please, stop interrupting.

11:39:33 16 MS. DIXON: I'm not interrupting. I'm

11:39:34 17 objecting.

11:39:35 18 MS. HAYRAPETIAN: Don't object until I am done

11:39:38 19 with my question. Allow me a modicum of courtesy,

11:39:42 20 seriously.

11:39:43 21 MR. HAYDEN: Take a couple seconds to --

11:39:44 22 object before you answer.

11:39:46 23 THE WITNESS: Sure.

11:39:47 24 MS. HAYRAPETIAN: No. The witness is actually

11:39:48 25 doing fine. It's Counsel that is very unprofessionally

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11:39:53 1 interjecting objections in the middle of my question.

11:39:56 2 MS. DIXON: The question is very long.

11:39:57 3 Can we just make it a simple question?

11:40:00 4 MS. HAYRAPETIAN: Stop.

11:40:09 5 THE WITNESS: So I'm going to go take a

11:40:10 6 cigarette break.

11:40:12 7 MS. HAYRAPETIAN: I'm in the middle of a

11:40:13 8 question.

11:40:14 9 THE WITNESS: Sorry. I don't know.

11:40:14 10 BY MS. HAYRAPETIAN:

11:40:15 11 Q You don't know. Okay.

11:40:17 12 Without Tory UTP would go underwater; right?

11:40:20 13 MR. HAYDEN: Objection. Speculation.

11:40:26 14 BY MS. HAYRAPETIAN:

11:40:26 15 Q Do you have an answer?

11:40:28 16 A I don't know.

11:40:30 17 Q Sir?

11:40:30 18 A You are done with your question; right? I

11:40:32 19 just answered "I don't know."

11:40:35 20 MR. HAYDEN: Stay.

11:40:35 21 BY MS. HAYRAPETIAN:

11:40:36 22 Q Sir, we need to agree when it's time to take a

11:40:38 23 break.

11:40:38 24 A Okay. Well, I'm gonna go take a break because

11:40:38 25 I gotta pee and smoke, so you can agree.

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11:40:41 1 Q I will allow you to take --

11:40:42 2 A I don't need you to allow me. I'm going to go

11:40:44 3 pee and smoke.

11:40:45 4 Q Let me finish. I have one question left.

11:40:46 5 A No, no. You are just saying I finished the

11:40:47 6 question. You just finished your question, and I

11:40:49 7 answered. I gotta go pee. Now, I can pee here, or I

11:40:53 8 can pee in the bathroom.

11:40:54 9 MR. HAYDEN: Let's just get through her

11:40:55 10 question.

11:40:55 11 Let's move this along, guys -- everybody.

11:40:57 12 Come on.

11:40:58 13 THE WITNESS: I told you what I'm going to do.

11:40:59 14 I'm going to go use the restroom.

11:41:03 15 MS. HAYRAPETIAN: Please, have the record

11:41:03 16 reflect that the witness has walked off in the middle of

11:41:06 17 my questioning.

11:41:07 18 THE WITNESS: You know, your question was

11:41:08 19 done. You just told me. I gotta go.

11:41:13 20 MS. DIXON: It's only 10 minutes.

11:41:14 21 STENO TECH: Do we need -- do we need to go

11:41:14 22 off the record?

11:41:14 23 MS. HAYRAPETIAN: We can go off the record,

11:41:14 24 yeah.

11:41:16 25 THE VIDEOGRAPHER: The time is 11:41 AM



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11:41:18 1 Pacific Time. We are now off the record.

11:41:25 2 (Recess was taken.)

11:57:52 3 THE VIDEOGRAPHER: The time is 12:05 PM

12:05:41 4 Pacific time. We are back on the record.

12:05:45 5 MS. HAYRAPETIAN: Okay. So, at the break, we  
12:05:48 6 checked the "TMZ" article that we were discussing that's  
12:05:55 7 posted on the UTP website, and we confirmed that the  
12:05:58 8 date is September 17, 2021; so before trial started, not  
12:06:02 9 2023. And I think that resolves the issue of where Tory  
12:06:10 10 was. Okay.

12:06:20 11 BY MS. HAYRAPETIAN:

12:06:20 12 Q Mr. McDowell, before Ms. Pete filed this  
12:06:21 13 lawsuit, UTP passed on information about Tory's appeal  
12:06:25 14 to Ms. Cooper for her to then post on social media;  
12:06:29 15 correct?

12:06:30 16 A I don't remember.

12:06:31 17 MR. HAYDEN: Objection. Speculation.

12:06:31 18 BY MS. HAYRAPETIAN:

12:06:32 19 Q Ms. Cooper produced four emails she exchanged  
12:06:36 20 with a member of UTP's legal team --  
12:06:38 21 Ms. Jazmyne Jamison.

12:06:43 22 MS. HAYRAPETIAN: And I'd to mark for the  
12:06:45 23 record Exhibit Number 79 as Tab 6 -- and I'm sorry. I'm  
12:06:56 24 going to have to pause for a moment.

12:06:59 25 It looks like we've had new people join --

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12:07:02 1 Mr. McLymont -- and I just wanted to get his appearance  
12:07:10 2 on the record.

12:07:10 3 And moving forward, I'm going to ask anyone  
12:07:14 4 attending remotely to state their appearance and confirm  
12:07:19 5 that they are alone and no one is present or plans to be  
12:07:24 6 present for the remainder of the testimony here today.

12:07:32 7 MR. MCLYMONT: This is attorney  
12:07:34 8 Jeremy McLymont. I joined the Zoom right before we took  
12:07:37 9 a break -- the last break.

12:07:41 10 MS. HAYRAPETIAN: And you can confirm your  
12:07:42 11 alone and plan to be alone for the duration of this  
12:07:45 12 testimony?

12:07:46 13 MR. MCLYMONT: Yes.

12:07:47 14 MS. HAYRAPETIAN: Thank you.

12:07:51 15 Okay. I'm going to pass out Exhibit  
12:08:00 16 Number 79.

12:08:02 17 (Exhibit 79 was marked for identification.)

12:08:02 18 BY MS. HAYRAPETIAN:

12:08:02 19 Q Okay. Who is Ms. Jamison?

12:08:32 20 Mr. McDowell.

12:08:34 21 A Hey.

12:08:34 22 Q Who is Ms. Jamison, Jazmyne Jamison?

12:08:38 23 A One of the people that helped us with social  
12:08:41 24 media, I think.

12:08:42 25 Q Okay. And, before the break, you had a chance

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12:08:48 1 to go outside, use the restroom, and I'm assuming finish  
12:08:53 2 your joint?  
12:08:55 3 A My joint?  
12:08:56 4 Q Yeah. Is that what it was?  
12:09:00 5 MS. DIXON: He said he was smoking a  
12:09:01 6 cigarette.  
12:09:07 7 THE WITNESS: Is there a question?  
12:09:08 8 BY MS. HAYRAPETIAN:  
12:09:08 9 Q Yeah.  
12:09:09 10 A You are serious?  
12:09:10 11 Q Yes.  
12:09:10 12 A Did I go outside and smoke a joint?  
12:09:12 13 Q Yes.  
12:09:14 14 A Now you are being disrespectful.  
12:09:15 15 Q No, I'm not. I noticed you were rolling up  
12:09:18 16 something on the record. And I get to ask if you are  
12:09:21 17 under the influence --  
12:09:23 18 A If I'm rolling a joint. No. I didn't roll a  
12:09:25 19 joint or smoke a joint.  
12:09:26 20 Q Okay.  
12:09:27 21 A Did you?  
12:09:27 22 Q You did not smoke marijuana?  
12:09:28 23 A Did you? Wow. I just answered the question.  
12:09:32 24 MR. HAYDEN: You can answer what the product  
12:09:33 25 is.

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12:09:34 1 THE WITNESS: It's not her business.

12:09:36 2 BY MS. HAYRAPETIAN:

12:09:36 3 Q Actually, if you are under the influence and

12:09:38 4 cannot answer my questions, it is my business.

12:09:42 5 A It's not her business what it was. I just

12:09:45 6 said it wasn't marijuana.

12:09:45 7 Q Okay. So Ms. Jamison was someone handling

12:09:54 8 your social media. And looking at this email, from

12:09:57 9 Ms. Jamison on Tuesday, December 12th, 2023, the email

12:10:03 10 was sent to three individuals -- three individuals --

12:10:05 11 milagrogramz@gmail.com, torylanezdaily@gmail.com, and

12:10:12 12 tia@teawithtia.org.

12:10:16 13 Do you see that on page 1? Top of the page in

12:10:28 14 the to section. Yes?

12:10:32 15 A I see this piece of paper says that.

12:10:34 16 Q Okay. So all three individuals are bloggers

12:10:38 17 and vocal supports of Tory Lanez; correct?

12:10:43 18 A I don't think so. I don't know.

12:10:44 19 Q So torylanezdaily@gmail.com is not a vocal

12:10:48 20 supporter of Tory?

12:10:49 21 A I don't know.

12:10:50 22 Q Okay. If we scroll all the way down to page 4

12:10:56 23 of 6, in this document produced by the Defendant

12:11:03 24 Ms. Cooper, Ms. Jamison wrote, "Hey, ladies, as

12:11:06 25 mentioned, the writ of habeas corpus for Daystar is

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12:11:11 1 attached."

12:11:11 2 Do you see that?

12:11:14 3 A I see the paper says that.

12:11:17 4 Q UTP sent to Ms. Cooper and the other bloggers

12:11:19 5 a copy of Tory's writ of habeas corpus so they could

12:11:24 6 post about it on their social media; correct?

12:11:27 7 A No. I don't see that. Where is that at?

12:11:30 8 Q So what did they send this for?

12:11:33 9 A I'm looking at a bunch of letters.

12:11:34 10 What are you talking about -- where is writ of

12:11:38 11 habeas corpus? Are you assuming what it is?

12:11:41 12 Q I'm not assuming.

12:11:41 13 A Are you saying it's a -- where it is?

12:11:44 14 Q States, "Hey, ladies, as mentioned, the writ

12:11:46 15 of habeas corpus for Daystar is attached." The format

12:11:50 16 that Ms. Cooper has produced this in.

12:11:53 17 A I don't see a writ of habeas corpus; so I'm

12:11:55 18 going to answer no.

12:11:56 19 Q Okay. So at any point did UTP send documents

12:12:02 20 to Ms. Cooper and others to post on social media?

12:12:07 21 A I don't remember.

12:12:10 22 Q And looking at this email, you don't remember?

12:12:14 23 A This email says it was sent from me?

12:12:19 24 Q Let's go to --

12:12:20 25 A It says it was sent from Jazmyne Jamison, I

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12:12:22 1 think.

12:12:22 2 Q Actually, if you go to the following page, you  
12:12:26 3 can see that the email chain starts from you.

12:12:33 4 A What page? Where is that at?

12:12:34 5 Q 5. Page 5.

12:12:48 6 A No. I don't see that the email chain has  
12:12:50 7 started from me, and I don't see a writ of  
12:12:53 8 habeas corpus.

12:12:54 9 Q Okay.

12:12:54 10 A I just see a whole bunch of little letters,  
12:12:57 11 letters, letters.

12:12:58 12 Q Right. Yeah. And that's the format in which  
12:13:02 13 this was produced by the defendant. You can also go --

12:13:05 14 A Okay. Well, I don't think it's it. I'm  
12:13:07 15 answering no again. I don't see that.

12:13:09 16 Q Okay. You can also go to the bottom of page 4  
12:13:12 17 where the message was forwarded from you, Mr. McDowell,  
12:13:15 18 ceasarceo@gmail.com.

12:13:19 19 Do you see that?

12:13:20 20 A I see where the paper says that.

12:13:22 21 Q Okay. And then it says, "Subject 2023, 12,  
12:13:27 22 Peterson, WHC, Appellate Court, Final to File.pdf."

12:13:32 23 Do you see that?

12:13:33 24 A I see where the paper says that.

12:13:35 25 Q Okay.

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12:13:36 1 A I don't see any writ of habeas corpus.

12:13:39 2 Q Okay. Well --

12:13:40 3 A So --

12:13:41 4 Q Ms. Jazmyne represented that it was attached,

12:13:46 5 and the attachment --

12:13:46 6 A Oh. So how come it's not here, if it was

12:13:48 7 attached?

12:13:49 8 Q Because this is how Ms. Cooper produced it.

12:13:51 9 A Well, you should have got it done right then.

12:13:53 10 Q I agree. And maybe her counsel can get us an

12:13:57 11 appropriate production of this email.

12:14:00 12 MS. DIXON: You have the -- you used your

12:14:04 13 resources to get it by using the log-in for her phone.

12:14:09 14 MS. HAYRAPETIAN: Actually, this was a

12:14:10 15 document produced directly from your client.

12:14:13 16 MS. DIXON: Okay.

12:14:23 17 MS. HAYRAPETIAN: Okay. Let's take a look at

12:14:24 18 Exhibit Number 80 which will be Tab 7.

12:14:44 19 (Exhibit 80 was marked for identification.)

12:14:45 20 BY MS. HAYRAPETIAN:

12:14:45 21 Q So the prior exhibit was dated -- an email

12:14:56 22 dated December 12th, 2023, from Unite the People to

12:14:59 23 Milagro Gramz and several bloggers.

12:15:03 24 The current exhibit, Number 80, is also an

12:15:07 25 email from Unite the People on February 27, 2024, a few

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12:15:13 1 months later, again, to Milagro Gramz,  
12:15:15 2 tia@teawithtia.org, and torylanezdaily@gmail.com. The  
12:15:23 3 subject line states, Forward, Peterson \_Filed AOB  
12:15:29 4 \_UTP.pdf.

12:15:34 5 Do you see that?

12:15:34 6 A I see where the paper says that.

12:15:36 7 Q Okay. And if you scroll down to page 4 of 5,  
12:15:40 8 your email addresses is noted --  
12:15:43 9 ceasar\_mcdowell@unitethepeople.org.

12:15:53 10 You asked your employee Ms. Jazmyne to then  
12:15:55 11 forward the documents relating to Tory's appeal to  
12:15:59 12 Ms. Cooper and other bloggers; right?

12:16:02 13 A I don't remember.

12:16:03 14 Q And you forwarded this so the bloggers could  
12:16:04 15 post about it on their social media; correct?

12:16:06 16 A I don't remember.

12:16:07 17 Q Tory told UTP to send these documents to  
12:16:11 18 Ms. Cooper and other bloggers so they can --

12:16:13 19 MR. HAYDEN: Objection. Sorry. Go ahead.

12:16:14 20 BY MS. HAYRAPETIAN:

12:16:15 21 Q So they could be leaked to the public;  
12:16:17 22 correct?

12:16:17 23 MR. HAYDEN: Objection. Speculation.

12:16:18 24 Assuming facts not in evidence.

12:16:22 25 BY MS. HAYRAPETIAN:



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12:16:22 1 Q Correct?

12:16:23 2 A I don't remember.

12:16:29 3 MS. HAYRAPETIAN: Let's look at Tab 8 which

12:16:30 4 will be Exhibit Number 81.

12:16:36 5 (Exhibit 81 was marked for identification.)

12:16:39 6 THE WITNESS: Do I get a check for being here?

12:16:40 7 Everybody else got a check. Why I ain't get a check?

12:16:43 8 You got my check? I don't get a check like everybody

12:16:48 9 else?

12:16:49 10 MS. HAYRAPETIAN: We can discuss at the break.

12:16:51 11 THE WITNESS: Okay.

12:16:51 12 MR. HAYDEN: You get a gold star.

12:16:52 13 THE WITNESS: Thank you.

12:16:57 14 MS. DIXON: Did you pass out 81 yet?

12:16:58 15 MS. HAYRAPETIAN: Sorry.

12:17:20 16 BY MS. HAYRAPETIAN:

12:17:20 17 Q And when you said everyone else got a check,

12:17:22 18 what did you mean by that?

12:17:23 19 A Didn't you give anyone else a check?

12:17:26 20 Q I don't know.

12:17:26 21 Who did we give a check to?

12:17:27 22 A I don't know. I'm asking you. I don't even

12:17:30 23 care about their check.

12:17:31 24 Do I get a check?

12:17:32 25 Q I mean, you said other people -- everybody got

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12:17:33 1 a check?

12:17:34 2 A I said, "Do I get a check?"

12:17:35 3 Q So I'm wondering who "everybody" is.

12:17:37 4 A I don't know.

12:17:38 5 Q You don't know?

12:17:39 6 A You were here, not me. I don't know.

12:17:40 7 Q But you are the one that said something about

12:17:42 8 a check.

12:17:42 9 A Do I get a check?

12:17:45 10 Q Were you talking about Tory's dad getting a

12:17:47 11 check?

12:17:48 12 A I don't know who got a check. I'm asking, "Do

12:17:50 13 I get a check."

12:17:53 14 Q Okay. Let's look at Exhibit 81 which is a

12:17:58 15 third email from Unite the People to only Milagro Gramz

12:18:03 16 this time, on August 4th, 2024, Subject is

12:18:10 17 Daystar Peterson, Attorney General's Reply Brief.

12:18:14 18 Do you see that?

12:18:19 19 A Yeah. I see where the paper says that.

12:18:22 20 Q Great. And then page 4, is your email address

12:18:26 21 listed. And you forwarded this document, Attorney

12:18:31 22 General's Response to Tory's Appeal Brief, to your

12:18:34 23 employee Ms. Jamison and told her to share it with

12:18:37 24 Ms. Cooper; correct?

12:18:41 25 A I don't see where it says that. Where does it

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12:18:43 1 say share this with Ms. -- where do you see that? I  
12:18:46 2 don't see it, no.

12:18:50 3 Q Okay. But you -- you do see that you  
12:18:52 4 forwarded this email to your employee?

12:18:54 5 A I see where this paper says my name. I don't  
12:18:57 6 see where it says I forwarded it to who.

12:19:00 7 Q Do you see, in the middle of page 4, it says  
12:19:03 8 forwarded message from Ceasar McDowell to Jazmyne at  
12:19:08 9 Unite the People?

12:19:09 10 A Yeah. I see where that's typed on this paper.

12:19:11 11 Q And then Jazmyne takes your email and says,  
12:19:13 12 "Millie, please see the attachments below. As they  
12:19:17 13 pertain the AG response to Daystar. Let me know if you  
12:19:20 14 have any questions or concerns."

12:19:22 15 Do you see that?

12:19:24 16 A No. What page is that?

12:19:25 17 Q That's the same page, 4, right on top of your  
12:19:27 18 forwarded email.

12:19:32 19 A I don't see that.

12:19:38 20 Can you show me?

12:19:39 21 Q Uh-huh.

12:19:42 22 MS. HAYRAPETIAN: Let the record reflect, I am  
12:19:43 23 marking the applicable area and tabbing it for the  
12:19:47 24 witness's convenience.

12:19:50 25 THE WITNESS: Thank you. Oh, there it goes.

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12:19:53 1 MS. HAYRAPETIAN: Great. Awesome. Okay.

12:19:56 2 BY MS. HAYRAPETIAN:

12:19:56 3 Q Okay. So now you see the sentence I just

12:19:58 4 wrote; right?

12:20:00 5 A I see the lines you wrote, yeah.

12:20:01 6 Q Okay. Awesome.

12:20:02 7 A You wrote these sentences?

12:20:03 8 Q No, no, no. I did not write the sentences.

12:20:05 9 A You just said the sentences you wrote.

12:20:07 10 Q I stated.

12:20:08 11 A Oh, okay. I see them.

12:20:10 12 Q Okay. And you forwarded this to your employee

12:20:17 13 so she could send it to Ms. Cooper; correct?

12:20:20 14 A No.

12:20:20 15 Q Okay. So why did you forward it to your

12:20:21 16 employee?

12:20:22 17 A I didn't say I forwarded it. You are saying

12:20:24 18 that, not me.

12:20:25 19 Q Well, the document is saying it. The document

12:20:27 20 that the defendant in this case produced.

12:20:28 21 A Oh. Okay. I don't remember.

12:20:29 22 Q You don't remember forwarding?

12:20:31 23 A I don't remember.

12:20:32 24 Q Okay. Do you remember Tory telling you to

12:20:38 25 share his case filings with bloggers?

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12:20:42 1 MR. HAYDEN: Objection. Speculation.

12:20:44 2 THE WITNESS: I don't remember. I don't

12:20:45 3 remember.

12:20:46 4 BY MS. HAYRAPETIAN:

12:20:46 5 Q Okay. Do you know how Ms. Jamison became so

12:20:53 6 close to Ms. Cooper so as to start calling her by her

12:20:56 7 nickname, Millie?

12:21:00 8 MS. DIXON: Objection. Calls for speculation.

12:21:02 9 THE WITNESS: I don't remember.

12:21:03 10 BY MS. HAYRAPETIAN:

12:21:04 11 Q You don't remember?

12:21:05 12 A Huh-uh.

12:21:05 13 Q So you knew at one point, and now you don't

12:21:07 14 remember?

12:21:07 15 A I knew what at one point? I just told you I

12:21:10 16 don't know none of the Millie or Milagros or what you

12:21:14 17 just said; so how would I know that now? I said, "I

12:21:16 18 don't remember."

12:21:17 19 Q Actually, you said you don't remember which

12:21:20 20 indicates you may have known at some point; so I'm just

12:21:22 21 trying to get clarification.

12:21:24 22 Did you know at --

12:21:24 23 A No. I don't remember nothing.

12:21:25 24 Q Please, let me finish my question.

12:21:27 25 A Sure.

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12:21:27 1 Q Did you know at some point and forgot, or you  
12:21:29 2 never knew?  
12:21:30 3 A I don't remember.  
12:21:32 4 Q You don't remember if you ever knew?  
12:21:35 5 A No. I don't remember anything.  
12:21:37 6 Q But you might have known?  
12:21:39 7 A I don't know nothing.  
12:21:40 8 Q Okay. Someone at UTP made the decision to  
12:21:46 9 send these documents to Ms. Cooper; correct?  
12:21:49 10 A I don't know.  
12:21:49 11 Q Okay. What is Jamison's title?  
12:21:54 12 A I don't know.  
12:21:55 13 Q You said she was social media?  
12:21:58 14 A I said she might have helped us with our  
12:21:59 15 social media.  
12:22:00 16 Q Okay. What else might she had helped with?  
12:22:03 17 A I don't know.  
12:22:03 18 Q So, as the CEO of Unite the People, you do not  
12:22:07 19 know, sitting here today, what your employee Jazmyne --  
12:22:12 20 A Uh-huh. I didn't tell you she was a employee.  
12:22:14 21 Q Sir?  
12:22:14 22 A You keep saying "employee."  
12:22:16 23 Q Sir?  
12:22:16 24 A Sir.  
12:22:16 25 Q I am asking a question. Please allow me to

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12:22:19 1 finish --

12:22:20 2 A Uh-huh. Sure.

12:22:20 3 Q -- before you respond.

12:22:25 4 Jaz@unitethepeople.org -- she has an email

12:22:31 5 address with your company's "at"; right?

12:22:39 6 A Are you done?

12:22:41 7 Q I am finished, yes.

12:22:43 8 Can you answer my question?

12:22:44 9 A Sure. You said does she have a email?

12:22:46 10 Q Yeah.

12:22:47 11 A Yeah. There's a lot of people that have

12:22:48 12 emails.

12:22:49 13 Q Okay. So --

12:22:50 14 A That aren't employees.

12:22:51 15 Q So I could technically today get an email

12:22:53 16 account that says marie@unitethepeople.org?

12:22:58 17 A Uh-huh. If you do volunteer work with the

12:22:59 18 city, absolutely. Anything you do for the community,

12:23:01 19 you can get an email.

12:23:03 20 Q Okay. So how many people have

12:23:05 21 @unitethepeople.org email addresses?

12:23:07 22 A At least a 100.

12:23:08 23 Q At least a 100. Okay.

12:23:10 24 So Jaz Jamison -- is she paid by Unite the

12:23:15 25 People?

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12:23:16 1 A Never.

12:23:16 2 Q Are any of your employees paid by Unite the

12:23:18 3 People?

12:23:18 4 A Yes.

12:23:19 5 Q Who?

12:23:20 6 A The employees.

12:23:21 7 Q Which ones?

12:23:23 8 A I don't know.

12:23:26 9 Q Okay. So are you saying Jazmyne Jamison is

12:23:29 10 not an employee of Unite the People?

12:23:34 11 A Define "employee." Is employee what? Give me

12:23:36 12 a definition of employee.

12:23:38 13 Q What does "employee" mean to you?

12:23:40 14 A Somebody that I pay.

12:23:42 15 Q Okay. Is Jazmyne Jamison someone you have

12:23:45 16 ever paid?

12:23:46 17 A Nope. Nope.

12:23:47 18 Q You or UTP have never cut --

12:23:51 19 A Never.

12:23:51 20 Q -- a single check to Jaz Jamison?

12:23:53 21 A Never once.

12:23:54 22 Q Okay. So she is simply in charge of your

12:23:56 23 social media?

12:23:57 24 A I didn't say she was in charge.

12:23:59 25 Q Okay.



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12:23:59 1 A I said she may have helped us with social  
12:24:01 2 media.

12:24:02 3 Q Okay. So why were you forwarding these  
12:24:04 4 documents?

12:24:04 5 A I didn't say I forwarded them.

12:24:06 6 Q The document --

12:24:07 7 A I said I didn't remember.

12:24:08 8 Q Right. The document says you forwarded it.

12:24:09 9 So why would you have been forwarding material  
12:24:12 10 to someone who is an agent of your organization with  
12:24:18 11 your organization's email address? Why did you forward  
12:24:22 12 it to them?

12:24:25 13 A Are you done?

12:24:27 14 Q Yes.

12:24:28 15 A Okay. I don't remember.

12:24:29 16 Q You don't remember.

12:24:41 17 The purpose of Jazmyne forwarding your email  
12:24:43 18 to Ms. Cooper was so that Ms. Cooper could post it to  
12:24:47 19 her social media account; correct?

12:24:49 20 A I don't remember.

12:24:49 21 Q Tory wanted the public to know about these  
12:24:52 22 court filings; correct?

12:24:53 23 MR. HAYDEN: Objection. Speculation.

12:24:55 24 THE WITNESS: I don't remember.

12:24:55 25 BY MS. HAYRAPETIAN:

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12:24:56 1 Q UTP was helping Tory get the information to  
12:24:59 2 Ms. Cooper so she could share it publicly; correct?

12:25:02 3 MR. HAYDEN: Objection. Speculation.

12:25:04 4 THE WITNESS: I don't remember.

12:25:04 5 BY MS. HAYRAPETIAN:

12:25:05 6 Q This wasn't Ms. Cooper's idea. This came from  
12:25:10 7 Tory through UTP; correct?

12:25:11 8 MR. HAYDEN: Same objection.

12:25:13 9 THE WITNESS: I don't remember.

12:25:13 10 BY MS. HAYRAPETIAN:

12:25:14 11 Q Do you know if Ms. Cooper requested this  
12:25:18 12 information?

12:25:21 13 A I don't remember.

12:25:22 14 Q These emails -- the three emails we looked at  
12:25:27 15 are not the only information that UTP passed on from  
12:25:29 16 Tory to Ms. Cooper; correct?

12:25:32 17 MR. HAYDEN: Objection. Speculation.  
12:25:33 18 Assuming facts not in evidence.

12:25:36 19 THE WITNESS: I don't remember.

12:25:36 20 BY MS. HAYRAPETIAN:

12:25:43 21 Q In fact, between July 2020 after the shooting,  
12:25:47 22 and up until recently when UTP represented Ms. Cooper,  
12:25:56 23 UTP passed on multiple piece of information from Tory to  
12:25:57 24 Ms. Cooper; correct?

12:26:00 25 MR. HAYDEN: Objection. Speculation.

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12:26:01 1 THE WITNESS: I don't remember.

12:26:02 2 BY MS. HAYRAPETIAN:

12:26:02 3 Q Some of that information that was passed to

12:26:07 4 Ms. Cooper was about Ms. Pete; correct?

12:26:12 5 A I don't recall.

12:26:13 6 Q Some of that information that was passed to

12:26:15 7 Ms. Cooper was about Tory's criminal case; correct?

12:26:20 8 A I don't remember.

12:26:22 9 Q UTP passed on information that Tory wanted

12:26:24 10 Ms. Cooper to share publicly; correct?

12:26:26 11 MR. HAYDEN: Objection. Speculation.

12:26:29 12 THE WITNESS: I don't remember.

12:26:29 13 BY MS. HAYRAPETIAN:

12:26:30 14 Q UTP passed on Tory's messages about whether

12:26:33 15 Ms. Pete was telling the truth at his trial; correct?

12:26:37 16 A I don't remember.

12:26:39 17 Q UTP relayed Tory's position that Ms. Pete lied

12:26:42 18 when she testified he shot her; correct?

12:26:47 19 A I don't remember.

12:26:47 20 Q Ms. Cooper herself has admitted, during her

12:26:51 21 live streams, that she received information from and

12:26:55 22 about Tory through UTP well before the start of this

12:26:59 23 lawsuit; correct?

12:27:01 24 A That was a lot. I didn't hear you say she --

12:27:03 25 about Beegle Beagle? Who?

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12:27:05 1 Q Well, can you tell me which part was a lie?

12:27:08 2 A I said it was a lot. And I said I was trying

12:27:10 3 to hear you. I didn't -- or what I heard was Spiderman.

12:27:13 4 Q Sure. Of course. Let me repeat my question.

12:27:15 5 Ms. Cooper herself has admitted, during her

12:27:19 6 live streams, that she received information from and

12:27:24 7 about Tory through UTP; correct?

12:27:29 8 A I don't remember. You should ask her.

12:27:36 9 MS. HAYRAPETIAN: Could we please mark as

12:27:38 10 Exhibit 22-A, which would be the video, and then 22-B

12:27:49 11 which would be the corresponding transcript, and I'm

12:27:53 12 looking to pull up Tab 31-A and B.

12:28:01 13 STENO TECH: Just a moment. Can you give that

12:28:03 14 to me again, please?

12:28:05 15 MS. HAYRAPETIAN: Could you please pull up

12:28:07 16 Tab 31-A.

12:28:14 17 STENO TECH: So you want just the Tab 31-A

12:28:15 18 pulled up first.

12:28:16 19 THE COURT REPORTER: 22?

12:28:16 20 MS. HAYRAPETIAN: 22. And this would be B,

12:28:16 21 and the video were about to listen to would be A.

12:28:50 22 Sorry. Tab 82, not 22 -- exhibit -- sorry --

12:28:52 23 Exhibit 82-B and Tab 31.

12:29:00 24 STENO TECH: Give me just a moment. Okay.

12:29:12 25 You need which exhibit pulled up?

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12:29:14 1 MS. HAYRAPETIAN: I need Tab 31-A pulled up as  
12:29:18 2 Exhibit 82.  
12:29:19 3 STENO TECH: Okay. I just pulled it. And I  
12:29:20 4 have to share screen because it's a video.  
12:29:23 5 Is this the video that you need right here?  
12:29:26 6 MS. HAYRAPETIAN: Yes.  
12:29:26 7 STENO TECH: Okay.  
12:29:29 8 MS. DIXON: Was there an 81?  
12:29:31 9 MS. HAYRAPETIAN: Yeah. 81 was the  
12:29:32 10 August 4, 2024, email from Unite the People to  
12:29:35 11 Milagro Gramz.  
12:29:39 12 STENO TECH: Let me know when you need me to  
12:29:40 13 play.  
12:29:41 14 MS. HAYRAPETIAN: We are ready to play.  
12:29:42 15 (A video clip was played.)  
12:30:12 16 STENO TECH: Is that is it?  
12:30:12 17 MS. HAYRAPETIAN: Yeah, that's good. Thank  
12:30:13 18 you.  
12:30:14 19 (Exhibit 82-A was marked for identification.)  
12:30:14 20 (Exhibit 82-B was marked for identification.)  
12:30:14 21 BY MS. HAYRAPETIAN:  
12:30:15 22 Q So, on her July 5th, 2024, livestream,  
12:30:17 23 Ms. Cooper stated, "Let me actually pull up Unite the  
12:30:21 24 People's page because when anything happens with him,  
12:30:24 25 this is who you are going to hear from, and then

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12:30:27 1 obviously, I'm in contact with them; so you know I can  
12:30:30 2 get information from them."

12:30:35 3 Ms. Cooper explicitly mentioned she was in  
12:30:38 4 contact with UTP to get information from and about Tory;  
12:30:45 5 correct?

12:30:47 6 A Are you asking me?

12:30:48 7 Q Yeah.

12:30:48 8 A I don't see that. What I see is where she  
12:30:50 9 says she can get information about him.

12:30:52 10 Who is "him"? Are we assuming it's him, or  
12:30:55 11 are we assuming it's somebody else?

12:30:57 12 Q Are you --

12:30:59 13 A I'm just telling you what I'm reading.

12:31:01 14 Q Sure.

12:31:01 15 A You said about Tory. I don't see Tory's name  
12:31:03 16 in there. I see about him. I don't know; so I'm going  
12:31:06 17 to answer no. It looks like to me she's talking about  
12:31:09 18 him.

12:31:10 19 Q Okay. What other clients do you have that you  
12:31:14 20 give information to Ms. Cooper?

12:31:18 21 A I don't know. I don't remember.

12:31:21 22 Q Anyone other than Tory that is your client  
12:31:24 23 that Ms. Cooper could be talking about?

12:31:27 24 A I don't remember.

12:31:51 25 Q UTP made sure that Ms. Cooper had access to

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12:31:54 1 inside information regarding Tory's case so she could  
12:31:56 2 continue to spin positive narratives about Tory;  
12:31:59 3 correct?

12:31:59 4 MR. HAYDEN: Objection. Speculation.

12:32:02 5 MS. DIXON: Objection. Also compound. Vague  
12:32:03 6 and ambiguous.

12:32:09 7 THE WITNESS: I don't remember.

12:32:10 8 BY MS. HAYRAPETIAN:

12:32:10 9 Q Okay.

12:32:16 10 MS. HAYRAPETIAN: Can we please pull up  
12:32:17 11 Tab 32. They will be Exhibit 82. The transcript will  
12:32:45 12 be B, and the video will be A.

12:33:03 13 Can we pull up the video, please, which is  
12:33:05 14 Tab A.

12:33:15 15 STENO TECH: I cannot share both at the same  
12:33:16 16 time.

12:33:16 17 MS. HAYRAPETIAN: We do not need to pull up  
12:33:18 18 the transcript, unless I ask.

12:33:33 19 STENO TECH: You want 32-A?

12:33:36 20 MS. HAYRAPETIAN: Yes, please.

12:33:47 21 (A video clip was played.)

12:34:18 22 STENO TECH: Sorry it's taken so long. The  
12:34:20 23 exhibits are not in person.

12:34:24 24 MS. HAYRAPETIAN: Do we need to go off the  
12:34:26 25 record?

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12:34:26 1 STENO TECH: (Indiscernible.)

12:34:32 2 MS. HAYRAPETIAN: What did she say?

12:34:36 3 STENO TECH: Okay. Yes. Go off the record

12:34:37 4 and give me a moment. Because I am -- yes.

12:34:40 5 THE VIDEOGRAPHER: The time is 12:34 PM

12:34:42 6 Pacific time. We are now off the record.

12:34:44 7 (Recess was taken.)

12:35:29 8 THE VIDEOGRAPHER: The time is 12:35 PM

12:35:37 9 Pacific time. We are back on the record.

12:35:47 10 MS. HAYRAPETIAN: Are we ready to play the

12:35:48 11 video?

12:35:50 12 (A video clip was played.)

12:36:24 13 BY MS. HAYRAPETIAN:

12:36:24 14 Q Were you able to look at the screen with Megan

12:36:27 15 Thee Stallion in the background?

12:36:29 16 A Who?

12:36:30 17 Q Megan Thee Stallion playing in the background?

12:36:32 18 A Who is that? Who is Megan Thee Stallion?

12:36:35 19 Q You don't know who Megan Thee Stallion is?

12:36:37 20 A Huh-uh.

12:36:38 21 Q Do you know who Megan Pete is?

12:36:40 22 A Oh, yeah. That's the lady in this case.

12:36:41 23 Q Yes. So did you see the image of her while

12:36:44 24 Milagro Cooper was talking about you?

12:36:46 25 A No.



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12:36:46 1 Q Okay. Can we play that video again, and can  
12:36:49 2 you please look at the screen?  
12:36:50 3 A Sure. Let's do it.  
12:36:50 4 (A video clip was played.)  
12:37:24 5 BY MS. HAYRAPETIAN:  
12:37:25 6 Q Were you able to see the image of Ms. Pete?  
12:37:27 7 A I see Nicki Minaj.  
12:37:29 8 Q Well, that's what --  
12:37:30 9 A And I see the Glo- -- GloRilla.  
12:37:32 10 Q Okay. Well, did you see --  
12:37:34 11 A A stallion?  
12:37:35 12 Q Did you see Ms. Pete --  
12:37:36 13 A Oh, yeah. I saw Ms. Pete.  
12:37:38 14 Q -- during the video?  
12:37:39 15 A Yeah.  
12:37:40 16 Q Okay. Thank you.  
12:37:43 17 So on her October 28th livestream,  
12:37:44 18 Ms. Cooper declared "So we already talked about the writ  
12:37:47 19 of habeas corpus, but the documents were released, and  
12:37:49 20 so you can go to Unite the People and you can read it.  
12:37:51 21 I will be contacting Ceasar so that we can talk to him  
12:37:54 22 and go ahead and get some insight."  
12:37:59 23 Ms. Cooper publicly admitted to her followers  
12:38:02 24 that she had a direct line of access to you; correct?  
12:38:05 25 A That's what she said, it looks like.

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12:38:10 1 Q You were communicating directly with  
12:38:12 2 Ms. Cooper to share information about Tory; correct?  
12:38:15 3 A I don't remember.  
12:38:16 4 Q At this time Ms. Cooper was not a client of  
12:38:18 5 UTP; correct?  
12:38:19 6 A I don't remember.  
12:38:20 7 Q UTP primarily represents criminal defendants;  
12:38:32 8 correct?  
12:38:34 9 A I don't know.  
12:38:35 10 Q You don't know?  
12:38:36 11 A If they primarily?  
12:38:38 12 Q As the CEO of Unite the People, you don't know  
12:38:41 13 what the primary caseload?  
12:38:44 14 A Uh-huh. No. No.  
12:38:45 15 Q No.  
12:38:46 16 A Huh-uh.  
12:38:47 17 Q Okay. And you also don't know your company's  
12:38:50 18 mission?  
12:38:53 19 A My company's mission?  
12:38:54 20 MR. HAYDEN: Objection. Asked and answered.  
12:39:02 21 BY MS. HAYRAPETIAN:  
12:39:02 22 Q You don't? You don't remember your company's  
12:39:04 23 mission?  
12:39:05 24 A No.  
12:39:06 25 Q Most of UTP's clients are currently or

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12:39:14 1 formally incarcerated; correct?

12:39:16 2 A Oh, you are done? Was that a question or a

12:39:24 3 statement?

12:39:28 4 MS. HAYRAPETIAN: Could you read back my

12:39:29 5 question, please.

12:39:30 6 (The following record was read:

12:39:30 7 "QUESTION: Most of UTP's clients are

12:39:30 8 currently or formally incarcerated;

12:39:30 9 correct?")

12:39:39 10 THE WITNESS: I don't remember.

12:39:39 11 BY MS. HAYRAPETIAN:

12:39:40 12 Q Most of UTP's cases are in California;

12:39:43 13 correct?

12:39:47 14 A I don't remember.

12:39:48 15 Q Do you -- does UTP have offices anywhere else?

12:39:53 16 A I don't remember.

12:39:53 17 Q As a CEO of your company, you do not know,

12:39:58 18 sitting here today, whether there is a UTP anywhere

12:40:03 19 outside of California?

12:40:06 20 A I don't know that.

12:40:07 21 Q Who would know that information at UTP?

12:40:15 22 A I don't know. Probably you can Google it.

12:40:18 23 Q Okay.

12:40:18 24 A If there's a UTP in another state, you are

12:40:20 25 saying?

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12:40:21 1 Q Does your company --

12:40:23 2 A Oh, my company.

12:40:24 3 Q Your company.

12:40:24 4 A Okay.

12:40:25 5 Q UTP.

12:40:26 6 A Unite the People Inc.

12:40:27 7 Q Unite the People.

12:40:27 8 A No. No. We don't have an office outside the

12:40:31 9 state.

12:40:31 10 Q Okay. So you are limited to California?

12:40:35 11 A I don't know.

12:40:36 12 Q Okay. But you don't have offices outside of

12:40:38 13 the state?

12:40:39 14 A No, unite the People doesn't. UTP might.

12:40:42 15 Q What's the difference between UTP and Unite

12:40:43 16 the People?

12:40:46 17 A There's probably UTPs somewhere.

12:40:48 18 Q No. We established at the beginning of the

12:40:51 19 deposition that you --

12:40:53 20 A Uh-huh.

12:40:53 21 Q -- that you understood --

12:40:55 22 A Uh-huh.

12:40:55 23 Q -- Unite the People and UTP to be the same.

12:40:58 24 Do you recall?

12:40:59 25 A Yeah.

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12:41:00 1 Q You said yes?

12:41:01 2 A But your question to me right now was, is

12:41:02 3 there a UTP outside of California? I don't know.

12:41:05 4 Google it.

12:41:06 5 Q Okay. Any time I say "UTP" --

12:41:09 6 A Uh-huh.

12:41:10 7 Q -- I mean Unite the People.

12:41:12 8 A You seem like you are getting aggressive with

12:41:14 9 me. Why?

12:41:15 10 Q I am clarifying something for you.

12:41:16 11 A Okay. Seems aggressive.

12:41:17 12 Q Which part of it seemed aggressive?

12:41:19 13 A Your demeanor, your tone, your deliverance --

12:41:21 14 it all seems aggressive.

12:41:24 15 Q Okay. Well, you are misreading me.

12:41:26 16 A Oh, okay.

12:41:27 17 Q So any time, as I explained at the very start

12:41:29 18 of my deposition, and you agreed -- every time I say

12:41:36 19 Unite the People or UTP, it means the same thing.

12:41:42 20 Do you understand?

12:41:48 21 A Yes.

12:41:50 22 Q Okay. Great. Glad we're on the same page.

12:41:54 23 A We're not on the same page, but I understand.

12:41:56 24 Q So does Unite the People, aka UTP, operate

12:42:04 25 outside of California?

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12:42:07 1 A Unite the People aka UTP. No.

12:42:10 2 Q UTP focus -- UTP -- most of UTP's work

12:42:17 3 involves post-conviction matters; correct?

12:42:20 4 MR. HAYDEN: Objection. Asked and answered.

12:42:22 5 THE WITNESS: I don't remember.

12:42:22 6 BY MS. HAYRAPETIAN:

12:42:23 7 Q As the CEO of Unite the People, you do not

12:42:28 8 know whether most of UTP's work involves post-conviction

12:42:33 9 matters?

12:42:34 10 A I don't remember.

12:42:35 11 Q Does a large amount of UTP's work involve

12:42:40 12 post-conviction matters?

12:42:42 13 A Yes.

12:42:45 14 Q UTP focuses on helping prisoners with appeals

12:42:49 15 and sentence reductions; correct?

12:42:53 16 A I don't remember.

12:42:56 17 Q Unite the People focuses on helping prisoners;

12:42:58 18 correct?

12:43:01 19 A Unite the People focuses on helping homeless.

12:43:03 20 Unite the People focuses on helping children. Unite the

12:43:06 21 People focuses on sober living homes. Unite the People

12:43:08 22 focuses on transitional housing. Unite the People

12:43:14 23 focuses on mentorships [as heard].

12:43:15 24 Q What kind of mentorships do you guys focus on?

12:43:17 25 A At-risk youth.

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12:43:18	1	Q	What does that mean?
12:43:21	2	A	What does at-risk youth mean?
12:43:23	3	Q	Yeah?
12:43:24	4	A	It means youth that are at risk.
12:43:25	5	Q	Of what?
12:43:27	6	A	A lot. Anything that they're at risk of.
12:43:30	7	Q	Like going to prison?
12:43:32	8	A	Sure.
12:43:33	9	Q	Anything else?
12:43:34	10	A	Yeah.
12:43:35	11	Q	What else?
12:43:36	12	A	A lot of stuff. At-risk gangs, gang violence,
12:43:41	13		sexual abuse, domestic violence, drugs -- a lot of
12:43:46	14		things.
12:43:48	15		THE COURT REPORTER: Wait. I need you to slow
12:43:49	16		down.
12:43:49	17		THE WITNESS: Slow down? Yes, ma'am.
12:43:51	18		THE COURT REPORTER: Thank you.
12:43:51	19		THE WITNESS: All right.
12:43:51	20		BY MS. HAYRAPETIAN:
12:43:52	21	Q	And what inspired you to seek out those kind
12:43:56	22		of cases?
12:44:01	23	A	What kind of cases?
12:44:03	24	Q	At youth risk?
12:44:04	25	A	At risk.

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12:44:05 1 Q At-risk youth. Thank you. Sorry.

12:44:07 2 A It's okay. I like helping people.

12:44:12 3 Q Okay. Ms. Cooper was never incarcerated;

12:44:17 4 correct?

12:44:18 5 A I don't know.

12:44:20 6 Q Ms. Cooper's case was a civil defamation

12:44:22 7 lawsuit, not a criminal matter; correct?

12:44:24 8 A I don't remember.

12:44:25 9 Q You don't remember whether the case you took

12:44:28 10 on for Ms. Cooper was --

12:44:29 11 A No, I did not.

12:44:30 12 Q -- civil or criminal?

12:44:32 13 A No, ma'am.

12:44:32 14 Q Do you have a diagnosis on memory loss?

12:44:38 15 MS. DIXON: Objection. That's argumentative.

12:44:42 16 THE WITNESS: I don't remember.

12:44:42 17 BY MS. HAYRAPETIAN:

12:44:42 18 Q Have you ever seen a doctor to consult about

12:44:44 19 your memory?

12:44:49 20 A Probably so.

12:44:50 21 Q And what did the doctor say?

12:44:53 22 A Said I was 6 foot 1. I don't remember.

12:44:56 23 Q Okay. And when did you seek doctor's care for

12:45:01 24 issues with your memory?

12:45:04 25 A I've seen a lot of doctors.



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12:45:06 1 Q But which one did you see with regards to your  
12:45:08 2 memory?  
12:45:09 3 A A lot of them. I don't remember their names.  
12:45:12 4 Q Okay. And why did you seek a doctor's  
12:45:15 5 opinion?  
12:45:18 6 A I don't remember.  
12:45:19 7 Q Did they give you a diagnosis?  
12:45:21 8 A I don't remember. It would be in my prison  
12:45:24 9 file. You can check that.  
12:45:28 10 Q What were you in prison for again?  
12:45:30 11 A I don't remember.  
12:45:31 12 Q Ms. Cooper's case was filed in federal court  
12:45:42 13 in Florida, not California; correct?  
12:45:44 14 A I don't remember.  
12:45:45 15 Q This wasn't a post-conviction matter; correct?  
12:45:49 16 A I don't remember.  
12:45:49 17 Q Ms. Cooper doesn't fit UTP's typical client  
12:45:54 18 profile, does she?  
12:45:55 19 A I don't remember.  
12:45:56 20 Q UTP doesn't normally take civil defamation  
12:46:00 21 cases; correct?  
12:46:02 22 A I don't remember.  
12:46:03 23 Q UTP doesn't normally represent clients in  
12:46:06 24 Florida in federal court; correct?  
12:46:14 25 A I don't remember.

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12:46:14 1 Q UTP doesn't normally represent  
12:46:16 2 non-incarcerated clients; correct?

12:46:20 3 A I don't remember.

12:46:21 4 Q So why did UTP make an exception for  
12:46:25 5 Ms. Cooper?

12:46:30 6 A I'm sure they didn't.

12:46:31 7 Q What do you mean?

12:46:32 8 A Your prior question. Your prior question was  
12:46:35 9 what again? Do we have clients out of prison?

12:46:40 10 Q My prior question was, so why did UTP make an  
12:46:43 11 exception for Ms. Cooper?

12:46:44 12 A Oh, that was this one, not prior. That was  
12:46:46 13 this one -- I don't remember.

12:46:48 14 Q Okay.

12:46:50 15 A I tried to help you.

12:46:52 16 Q One reason UTP made an exception and took on  
12:46:56 17 Ms. Cooper's case was because of her connection to Tory;  
12:46:59 18 correct?

12:47:00 19 MR. HAYDEN: Objection. Speculation.

12:47:01 20 THE WITNESS: I don't remember.

12:47:01 21 BY MR. MCLYMONT:

12:47:02 22 Q Tory asked you to represent Ms. Cooper; right?

12:47:05 23 MR. HAYDEN: Objection. Speculation.

12:47:06 24 THE WITNESS: I don't remember.

12:47:06 25 BY MS. HAYRAPETIAN:

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12:47:07 1 Q You couldn't say no to Tory's request; right?

12:47:14 2 MR. HAYDEN: Objection. Speculation. Asked  
12:47:15 3 and answered.

12:47:16 4 THE WITNESS: I don't remember.

12:47:16 5 BY MS. HAYRAPETIAN:

12:47:17 6 Q You don't remember whether it happened?

12:47:24 7 A I don't remember anything.

12:47:25 8 MR. HAYDEN: Objection. Assuming facts not in  
12:47:26 9 evidence.

12:47:26 10 BY MS. HAYRAPETIAN:

12:47:27 11 Q Did you meet Tory in your childhood?

12:47:35 12 A Are you talking to me?

12:47:36 13 Q Uh-huh.

12:47:36 14 A Did I meet him in my childhood?

12:47:39 15 Q Yeah.

12:47:39 16 A I don't remember.

12:47:40 17 Q Were you an adult when you became friends with  
12:47:42 18 Tory?

12:47:43 19 A I don't remember.

12:47:46 20 Q Where did you meet Tory?

12:47:49 21 A I don't remember.

12:47:50 22 Q You understand that Ms. Pete sued Ms. Cooper  
12:47:58 23 for defamation; correct?

12:47:59 24 A Did she?

12:48:01 25 Q You took on the case, right, as CEO of Unite

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12:48:05 1 the People?

12:48:05 2 A I don't remember.

12:48:06 3 Q You don't remember taking on this case?

12:48:08 4 A No.

12:48:08 5 Q The lawsuit was filed on October 30th, 2024;

12:48:13 6 correct?

12:48:13 7 A Was it?

12:48:17 8 Q Do you recall?

12:48:17 9 A I don't remember.

12:48:18 10 Q And Ms. Cooper was being sued for statements

12:48:21 11 she made supporting Tory; correct?

12:48:25 12 A I don't remember.

12:48:26 13 Q The same day the lawsuit was filed, you spoke

12:48:33 14 to Tory about it; correct?

12:48:35 15 A I don't remember.

12:48:36 16 Q Tory told you he wanted UTP to represent

12:48:41 17 Ms. Cooper; correct?

12:48:42 18 MR. HAYDEN: Objection. Speculation. Asked

12:48:43 19 and answered. Assuming facts not in evidence.

12:48:45 20 THE WITNESS: I don't remember.

12:48:46 21 BY MS. HAYRAPETIAN:

12:48:47 22 Q This wasn't Ms. Cooper's idea, was it?

12:48:52 23 A I don't remember.

12:48:52 24 Q It was Tory's idea?

12:48:55 25 MR. HAYDEN: Objection. Speculation.

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12:48:56 1 Assuming facts not in evidence.

12:48:58 2 THE WITNESS: I don't remember.

12:48:58 3 BY MS. HAYRAPETIAN:

12:48:59 4 Q So you already testified that you are  
12:49:08 5 involved, and you are the CEO of UTP.

12:49:16 6 A Is that the question?

12:49:18 7 Q I'm -- I'm trying to finish.

12:49:20 8 A Oh, I didn't know. It sounded like you  
12:49:22 9 stopped.

12:49:23 10 Q And you have involvement in bringing in cases,  
12:49:26 11 right, as the CEO of the company?

12:49:29 12 A Can you repeat that? I didn't understand  
12:49:31 13 that. The question seemed two-part.

12:49:34 14 Q Okay. As the CEO of Unite the People -- and  
12:49:36 15 you are; right. That was a bad question.

12:49:38 16 As the CEO of Unite the People, you have the  
12:49:42 17 ability to bring in cases to the company; correct?

12:49:48 18 A What do you mean "bring in cases"?

12:49:50 19 Q Suggest cases that Unite the People should  
12:49:53 20 take on.

12:49:56 21 A I don't remember.

12:49:57 22 Q But you are not denying that as CEO you have  
12:50:02 23 the power to do so?

12:50:04 24 A I don't remember.

12:50:05 25 Q Tory asked you to have UTP represent

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12:50:13 1 Ms. Cooper; correct?

12:50:14 2 MR. HAYDEN: Objection. Asked and answered.  
12:50:15 3 Speculation. Assuming facts not in evidence.

12:50:20 4 THE WITNESS: I don't remember.

12:50:21 5 MS. HAYRAPETIAN: And, actually, the question  
12:50:23 6 wasn't answered. The witness has just been saying "I  
12:50:26 7 don't remember" for the last several hours. And I think  
12:50:29 8 everyone in this room knows that that is not a  
12:50:32 9 legitimate answer; so --

12:50:34 10 MR. HAYDEN: Speculation, not a question.

12:50:35 11 BY MS. HAYRAPETIAN:

12:50:36 12 Q Tory understood that Ms. Cooper was in legal  
12:50:39 13 trouble; correct?

12:50:41 14 MR. HAYDEN: Objection. Speculation.

12:50:44 15 THE WITNESS: I don't know.

12:50:44 16 BY MS. HAYRAPETIAN:

12:50:45 17 Q Tory knew Ms. Cooper was being sued for  
12:50:46 18 statements that supported him; correct?

12:50:48 19 MR. HAYDEN: Objection. Speculation.

12:50:50 20 THE WITNESS: I don't know.

12:50:50 21 BY MS. HAYRAPETIAN:

12:50:52 22 Q Tory felt Ms. Cooper deserved legal help  
12:50:54 23 because she supported him; correct?

12:50:56 24 MR. HAYDEN: Objection. Speculation.

12:50:57 25 THE WITNESS: I don't know.

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12:50:57 1 BY MS. HAYRAPETIAN:

12:50:58 2 Q That's why Tory directed you to represent her;

12:51:00 3 correct?

12:51:01 4 MR. HAYDEN: Objection. Speculation.

12:51:02 5 Assuming facts not in evidence.

12:51:04 6 THE WITNESS: I don't know.

12:51:05 7 BY MS. HAYRAPETIAN:

12:51:06 8 Q This lawsuit was filed against Ms. Cooper on

12:51:08 9 October 30, 2024. That same day, you spoke to Tory over

12:51:13 10 a recorded prison phone line about UTP's representation

12:51:16 11 of Ms. Cooper.

12:51:18 12 Do you recall?

12:51:18 13 MR. HAYDEN: Objection. Attorney-client

12:51:19 14 privilege.

12:51:20 15 Instruct the witness not to answer.

12:51:32 16 MS. HAYRAPETIAN: You're instructing the

12:51:34 17 witness not to answer on whether he had a conversation

12:51:36 18 or not?

12:51:37 19 MR. HAYDEN: It's a recorded call on a jail

12:51:38 20 phone. If it's -- if it's become public record, that's

12:51:40 21 one thing, but it's -- Tory Lanez is a client of Unite

12:51:43 22 the People. Ceasar McDowell is my client in this

12:51:48 23 capacity and part of the legal team of Unite the People.

12:51:51 24 That is a special limited circumstance where I can

12:51:54 25 request the witness not to answer the question that

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12:51:57 1 would incriminate himself or one of our clients.

12:52:00 2 MS. HAYRAPETIAN: So, first of all, I disagree  
12:52:04 3 with that statement, but I am simply, at this point, not  
12:52:11 4 asking about the substance of the conversation.

12:52:14 5 I am merely asking whether a conversation  
12:52:16 6 occurred on a specific day between specific people, and  
12:52:21 7 I am entitled to that information, even if it were to be  
12:52:24 8 privileged, because that is the exact type of  
12:52:27 9 information that would go on a privilege log.

12:52:31 10 So the instruction is, one, improper; but,  
12:52:35 11 two, this is -- you cannot claim privilege. The witness  
12:52:41 12 has already testified he had no power or involvement in  
12:52:47 13 the legal part of UTP. And these prison records have  
12:52:53 14 been produced in this litigation many, many, many months  
12:52:57 15 ago.

12:52:58 16 And if you had an objection, it has already  
12:53:01 17 been waived; so --

12:53:05 18 MR. HAYDEN: He can answer to knowledge of the  
12:53:07 19 conversation.

12:53:16 20 MS. HAYRAPETIAN: Can you read back my  
12:53:17 21 question.

12:53:17 22 (The following record was read:

12:53:17 23 "QUESTION: That's why Tory directed you  
12:53:17 24 to represent her; correct?")

12:53:17 25 THE COURT REPORTER: Or -- sorry. It's the



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12:53:17 1 next one.

12:53:17 2 (The following record was read:

12:53:17 3 "QUESTION: This lawsuit was filed against

12:53:17 4 Ms. Cooper on October 30, 2024. That same

12:53:17 5 day, you spoke to Tory over a recorded

12:53:17 6 prison phone line about UTP's

12:53:17 7 representation of Ms. Cooper. Do you

12:53:17 8 recall?")

12:53:52 9 THE WITNESS: I don't remember.

12:53:54 10 MS. HAYRAPETIAN: Okay.

12:53:55 11 And also only communications where legal

12:53:57 12 advice is sought or received are protected under

12:54:01 13 attorney-client privilege.

12:54:05 14 But let's pull up as Exhibit 84. I'm looking

12:54:10 15 for Tab A -- Tab 9-A, please.

12:54:51 16 STENO TECH: Do you want me to play it?

12:54:52 17 MS. HAYRAPETIAN: Yes, please.

12:54:53 18 (A video clip was played.)

12:55:20 19 MS. HAYRAPETIAN: It's fine. We can hear it.

12:55:22 20 STENO TECH: Oh, okay. I can't hear it. No

12:55:23 21 worries.

12:55:23 22 MS. HAYRAPETIAN: Just let it play. We can

12:55:24 23 hear it fine.

12:55:27 24 STENO TECH: Sorry.

12:55:27 25 MS. HAYRAPETIAN: Thank you.

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12:56:04 1 (A video clip was played.)

01:07:45 2 MS. HAYRAPETIAN: Okay. We can turn off the

01:07:45 3 recording. Thank you.

01:07:45 4 (Exhibit 84-A was marked for identification.)

01:07:45 5 (Exhibit 84-B was marked for identification.)

01:07:47 6 BY MS. HAYRAPETIAN:

01:07:49 7 Q So, on this October 30th call, you read Tory

01:07:58 8 a press release that UTP would issue the next day;

01:08:00 9 correct?

01:08:02 10 A Sound like it.

01:08:02 11 Q You said to Tory, quote, "Let me read it to

01:08:06 12 you. So it says Unite the People Inc. agrees to

01:08:09 13 represent this is the media release for tomorrow. Unite

01:08:13 14 the People Inc. agrees to represent Milagro Cooper

01:08:16 15 against threats and intimidation targeting influencers

01:08:20 16 for expressing their opinions in the civil matter filed

01:08:23 17 by the now-Claimant Megan Pete"; correct?

01:08:29 18 A I don't remember exactly all that was said,

01:08:30 19 but it sound like it.

01:08:33 20 Q Okay. And if you need to refer back to the

01:08:37 21 certified transcript in front of you, please do so.

01:08:39 22 It's on page 7, starting at lines 23 to 25; and page 8,

01:08:45 23 lines 1 to 5.

01:08:49 24 You were asking for Tory's approval of that

01:08:51 25 press release, weren't you?

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01:08:55 1 MR. HAYDEN: Speculation.

01:08:58 2 THE WITNESS: Didn't sound like it to me.

01:08:59 3 BY MS. HAYRAPETIAN:

01:08:59 4 Q Okay. So what were you doing?

01:09:01 5 A I don't remember what I was doing, but what

01:09:02 6 you just played, it didn't sound like I was asking

01:09:05 7 anybody for approval.

01:09:06 8 Q Okay. So what were you doing reading him --

01:09:10 9 A I just answered. I don't remember, but it

01:09:12 10 don't sound like I was asking anybody's approval.

01:09:14 11 Q Okay. So you don't remember why you were

01:09:16 12 reading it, but you know it wasn't for his approval?

01:09:18 13 A Not from what it just sounded like from what

01:09:21 14 you played.

01:09:21 15 Q Okay. So what did it sound like to you?

01:09:23 16 A It sound like two guys talking.

01:09:26 17 Q About what?

01:09:27 18 A I don't remember.

01:09:28 19 Q Why are you telling him about the press

01:09:30 20 release?

01:09:31 21 A I don't remember why.

01:09:32 22 Q You don't remember why you were telling

01:09:34 23 Tory Lanez about Milagro Cooper's press release on Unite

01:09:38 24 the People?

01:09:38 25 A I don't know why.

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01:09:39 1 Q Okay. But you know it wasn't to seek his  
01:09:41 2 approval -- I'm asking a question.

01:09:46 3 MS. DIXON: It wasn't her press release,  
01:09:47 4 that's all I'm saying.

01:09:49 5 MS. HAYRAPETIAN: Okay.

01:09:52 6 MS. DIXON: Just for point of clarification of  
01:09:53 7 the question.

01:09:53 8 BY MS. HAYRAPETIAN:

01:09:54 9 Q The press release about Ms. Cooper that you  
01:09:59 10 are telling Tory about; right? You don't remember why  
01:10:04 11 you were telling him; correct?

01:10:06 12 A I don't remember.

01:10:07 13 Q Okay. But you remember that you weren't  
01:10:09 14 seeking his opinion; correct?

01:10:11 15 A No, I don't remember. What I just heard  
01:10:14 16 didn't sound like somebody that was asking for  
01:10:18 17 direction.

01:10:26 18 Q But you needed Tory's approval for a press  
01:10:27 19 release before representing Ms. Cooper; right?

01:10:30 20 MR. HAYDEN: Objection. Speculation.

01:10:31 21 THE WITNESS: I don't remember.

01:10:31 22 BY MS. HAYRAPETIAN:

01:10:32 23 Q Before this call, had Tory asked you to  
01:10:35 24 represent Ms. Cooper?

01:10:38 25 A I don't remember.

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01:10:39 1 Q You wouldn't have represented Ms. Cooper  
01:10:42 2 without Tory's direction, would you?  
01:10:44 3 MR. HAYDEN: Objection. Speculation.  
01:10:46 4 THE WITNESS: I don't remember.  
01:10:46 5 BY MS. HAYRAPETIAN:  
01:10:47 6 Q And you met Ms. Cooper at Tory's trial; right?  
01:10:53 7 MS. DIXON: Objection. Asked and answered.  
01:10:57 8 THE WITNESS: I don't remember.  
01:10:57 9 BY MS. HAYRAPETIAN:  
01:10:59 10 Q Tory was the reason UTP took on Ms. Cooper's  
01:11:02 11 case; correct?  
01:11:04 12 MR. HAYDEN: Objection. Speculation.  
01:11:07 13 THE WITNESS: I don't remember.  
01:11:07 14 BY MS. HAYRAPETIAN:  
01:11:08 15 Q You are providing him an update on how his  
01:11:11 16 case is going; correct?  
01:11:12 17 MR. HAYDEN: Objection. Speculation.  
01:11:14 18 THE WITNESS: I don't remember.  
01:11:14 19 BY MS. HAYRAPETIAN:  
01:11:15 20 Q You then said to Tory, quote, "Unite the  
01:11:19 21 People Inc. has agreed to take on the defense of  
01:11:22 22 Milagro Cooper, as well as any other social media  
01:11:25 23 influencer, journalism platform, journalist podcast, or  
01:11:29 24 reporter of any type that has received this lawsuit  
01:11:31 25 against them or any other form of bullying/harassment to

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01:11:36 1 silence them from their right of freedom of speech."

01:11:42 2 You heard that; right?

01:11:44 3 A I heard that.

01:11:45 4 Q After UTP put out this media statement, did

01:11:48 5 any bloggers, podcasters, or social media personalities

01:11:52 6 reach out to UTP for legal advice or representation?

01:11:55 7 A I don't remember.

01:11:55 8 Q Do you currently have any cases other than

01:11:59 9 Ms. Cooper's?

01:12:01 10 A I don't remember.

01:12:03 11 Q So UTP has never represented any other social

01:12:10 12 media personalities other than Ms. Cooper?

01:12:13 13 A I don't remember.

01:12:14 14 Q Who would know at UTP?

01:12:21 15 A I don't know. I'd have to check.

01:12:22 16 Q Where would you have to check?

01:12:24 17 A At UTP.

01:12:25 18 Q Okay. So where would you go to find out the

01:12:31 19 information I'm asking you, if a judge was asking you?

01:12:35 20 A 555 East Ocean Boulevard, Suite 205,

01:12:38 21 Long Beach, California 90802. Unite the People --

01:12:41 22 that's where I would go to ask.

01:12:43 23 Q Okay. And who would you ask at Unite the

01:12:44 24 People?

01:12:46 25 A I'd have to find out. I don't know who to

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01:12:48 1 ask. I'd have to ask them who to ask.

01:12:50 2 Q So the CEO would have to ask --

01:12:53 3 A Who to ask.

01:12:53 4 Q -- someone as CEO --

01:12:55 5 A That seems logical.

01:12:56 6 Q -- at UTP --

01:12:57 7 A That sounds logical.

01:12:58 8 Q -- who to ask. Okay.

01:13:00 9 And who would you ask?

01:13:02 10 A I'd have to find out who to ask. I'd start

01:13:04 11 off by asking, "Who do I ask."

01:13:05 12 Q Okay. And who are you asking who do you ask?

01:13:07 13 A I don't know.

01:13:08 14 Q You don't know?

01:13:09 15 A Huh-uh.

01:13:10 16 Q So if we go to the judge in this case --

01:13:16 17 A Uh-huh. Let's go.

01:13:19 18 Q -- who are you going to tell her has the

01:13:22 19 responses to these questions since you don't know or you

01:13:25 20 don't remember?

01:13:26 21 A I don't know. Let's do it.

01:13:28 22 Q Ms. Cooper is unique because of her special

01:13:37 23 relationship with Tory, right, and that's why you took

01:13:40 24 on her case?

01:13:41 25 MR. HAYDEN: Objection. Speculation.

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01:13:42 1 THE WITNESS: She's unique?

01:13:42 2 BY MS. HAYRAPETIAN:

01:13:43 3 Q Yep.

01:13:43 4 A Is she? You said so, not me.

01:13:50 5 Q Tory asked you at what time UTP would post the

01:13:53 6 media statement. You responded, quote, "Probably first

01:13:57 7 thing in the morning. Indiscernible told me to post it

01:14:02 8 to my Instagram first, to the Unite the People

01:14:06 9 Instagram. And she said post it early, and then she'll

01:14:09 10 send it over to 'TMZ' and I guess whoever else. There's

01:14:12 11 a bunch of people. 'Rolling Stone'."

01:14:15 12 Do you recall hearing that just now?

01:14:19 13 A I heard something like that.

01:14:22 14 Q And who is the "she" you are referring to?

01:14:24 15 A I don't remember.

01:14:27 16 Q Are you referring to Ms. Mari Ronquillo?

01:14:30 17 A I don't remember.

01:14:30 18 Q Do you know who Ms. Mari Ronquillo is?

01:14:33 19 A I don't remember.

01:14:33 20 Q You don't remember if she is involved with

01:14:38 21 UTP?

01:14:43 22 A Do I remember if she's involved with Unite the

01:14:44 23 People.

01:14:44 24 Who is she?

01:14:45 25 Q I'm asking you. You don't know?



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01:14:47 1 A I -- I might -- I think -- I don't know.

01:14:51 2 Q You might?

01:14:51 3 A I don't recall right now.

01:14:52 4 Q You don't recall right now?

01:14:53 5 A Huh-uh.

01:14:54 6 Q Okay. Is she an advisory member of UTP?

01:15:01 7 A You would have to look at the website.

01:15:02 8 Q I have. And I'm telling you, she is; so --

01:15:04 9 A Thank you. You answered your question.

01:15:07 10 Q Okay. You agree, she is an advisory member of

01:15:09 11 UTP?

01:15:10 12 A No. I said you have to look at the website to

01:15:11 13 find out.

01:15:12 14 Q You've never heard her name?

01:15:16 15 A I didn't say that.

01:15:18 16 Q You've heard the name Ms. Mari Ronquillo?

01:15:24 17 A I might have.

01:15:25 18 Q You might have?

01:15:25 19 A Yeah.

01:15:26 20 Q Okay. Ms. Ronquillo is also the founder of

01:15:30 21 Lyme Lite Media and public relations; correct?

01:15:33 22 A I don't know.

01:15:33 23 Q Lyme Lite helps artists and entertainers with

01:15:37 24 their public relations?

01:15:38 25 A I don't know.

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01:15:39 1 Q Ms. Ronquillo advises UTP on its press  
01:15:42 2 releases and conferences; correct?

01:15:44 3 A I don't know.

01:15:45 4 Q Ms. Ronquillo also helps you with drafting  
01:15:48 5 social media posts on UTP's account; correct?

01:15:50 6 A I don't know.

01:15:51 7 Q So who helps you with the social media posts  
01:15:58 8 for UTP?

01:15:59 9 A I don't know.

01:16:01 10 THE WITNESS: Hey, do you have any Tylenol?  
01:16:03 11 My tooth is starting to kill me. I don't know.

01:16:06 12 BY MS. HAYRAPETIAN:

01:16:06 13 Q Tory also asked you whether UTP would have a  
01:16:09 14 conflict of interest in representing both him and  
01:16:12 15 Ms. Cooper. Tory asked "Because she is saying I'm a  
01:16:14 16 part of the board of advisory, so isn't that a conflict  
01:16:18 17 of interest?"

01:16:20 18 You responded, quote, "The only conflict of  
01:16:23 19 interest would be if Milagro didn't know we had  
01:16:27 20 represented you. You dig what I'm saying?"

01:16:34 21 Do you recall listening to that just now?

01:16:37 22 A I recall hearing that.

01:16:39 23 Q Okay. So why is it not a conflict of  
01:16:41 24 interest?

01:16:42 25 A I don't remember.

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01:16:45 1 Q Why is it not a conflict of represent to  
01:16:48 2 represent both Tory and Ms. Cooper?  
01:16:52 3 MS. DIXON: Objection. Calls for a legal  
01:16:53 4 opinion.  
01:16:54 5 THE WITNESS: I don't remember.  
01:16:54 6 BY MS. HAYRAPETIAN:  
01:16:55 7 Q Okay. So what did you mean when you told --  
01:16:59 8 THE WITNESS: You don't have Advil? Nothing?  
01:17:11 9 BY MS. HAYRAPETIAN:  
01:17:11 10 Q And going back, I'm going to show you Exhibit  
01:17:15 11 Number --  
01:17:24 12 MS. LEE: 85, I believe.  
01:17:27 13 MS. DIXON: Can we go off the record for a  
01:17:29 14 minute?  
01:17:30 15 MS. HAYRAPETIAN: No. I'm not done  
01:17:31 16 questioning.  
01:17:32 17 MS. DIXON: We had an agreement that we were  
01:17:33 18 going to go to lunch, and he said he had a headache.  
01:17:36 19 MS. HAYRAPETIAN: Okay. Well, you don't  
01:17:36 20 represent him; right?  
01:17:37 21 MS. DIXON: It doesn't matter. You can't put  
01:17:38 22 your hand in my face and tell me --  
01:17:40 23 (Multiple Simultaneous Speakers.)  
01:17:40 24 MR. HAYDEN: Let's -- let's get through the --  
01:17:41 25 MS. HAYRAPETIAN: To be clear, my hand is in

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01:17:43 1 no one's face. I am probably 10 feet away from opposing  
01:17:45 2 counsel.

01:17:46 3 MS. DIXON: Well, don't put your hand up  
01:17:47 4 anyway.

01:17:48 5 MS. HAYRAPETIAN: And I am in the middle of my  
01:17:50 6 questioning, and I'm going to finish my questioning.  
01:17:52 7 You continue to interrupt my questioning and everyone  
01:17:54 8 else's questioning. And we're not going off the record  
01:17:57 9 until I'm done with this part of my question.

01:18:01 10 BY MS. HAYRAPETIAN:

01:18:03 11 Q Okay.

01:18:05 12 THE WITNESS: Do they have a store around  
01:18:07 13 here? I'm having a toothache that's going to my head,  
01:18:09 14 like, it's real, real tough.

01:18:11 15 MR. HAYDEN: Let's get through this.

01:18:12 16 THE WITNESS: Can we speed it up or something?  
01:18:13 17 Or I'm going to have to go get medication.

01:18:15 18 BY MS. HAYRAPETIAN:

01:18:16 19 Q Yes. UTP came out with a public statement  
01:18:18 20 that it would represent Ms. Cooper on October 31st;  
01:18:20 21 correct?

01:18:21 22 A I don't remember when.

01:18:23 23 Q Why do you need to update a different client  
01:18:26 24 of yours, Tory, about UTP's representation of  
01:18:29 25 Ms. Cooper?

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01:18:32 1 A I don't remember.

01:18:34 2 Q You needed to update Tory because he

01:18:36 3 specifically asked you to represent Ms. Cooper; correct?

01:18:38 4 MR. HAYDEN: Objection. Speculation.

01:18:41 5 THE WITNESS: I don't remember.

01:18:42 6 BY MS. HAYRAPETIAN:

01:18:42 7 Q You couldn't say no to UTP's biggest client;

01:18:47 8 right?

01:18:48 9 MR. HAYDEN: Objection. Speculation. Asked

01:18:49 10 and answered.

01:18:54 11 BY MS. HAYRAPETIAN:

01:18:55 12 Q Right?

01:18:55 13 A Are you asking me that?

01:18:56 14 Q Yes.

01:18:56 15 A Who said he is my biggest client? You did? I

01:18:59 16 didn't say he was.

01:19:00 17 Q Okay. Who is your biggest client?

01:19:02 18 A I told you Allan McIntosh, I thought.

01:19:04 19 Q Okay. So one of UTP's biggest clients, you

01:19:07 20 couldn't say no to him; right -- Tory?

01:19:09 21 MR. HAYDEN: Objection. Asked and answered.

01:19:09 22 Speculation.

01:19:12 23 THE WITNESS: I don't remember.

01:19:13 24 BY MS. HAYRAPETIAN:

01:19:13 25 Q You couldn't say no to one of UTP's biggest

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01:19:15 1 financiers; right?

01:19:17 2 MR. HAYDEN: Objection. Speculation.

01:19:18 3 THE WITNESS: I don't remember.

01:19:19 4 BY MS. HAYRAPETIAN:

01:19:20 5 Q You couldn't say no to UTP's biggest adviser;

01:19:23 6 right?

01:19:24 7 MR. HAYDEN: Objection. Speculation.

01:19:26 8 THE WITNESS: I don't remember.

01:19:26 9 BY MS. HAYRAPETIAN:

01:19:27 10 Q You needed to update Tory because he promised

01:19:30 11 to help pay for any fees and costs relating to

01:19:33 12 Ms. Cooper's defense; correct?

01:19:35 13 MR. HAYDEN: Objection. Speculation.

01:19:37 14 THE WITNESS: I don't remember.

01:19:37 15 BY MS. HAYRAPETIAN:

01:19:38 16 Q You needed to update Tory because he is

01:19:40 17 funding your organization; correct?

01:19:46 18 A I don't remember.

01:19:49 19 MS. HAYRAPETIAN: Let's go off the record and

01:19:50 20 take lunch.

01:19:51 21 THE VIDEOGRAPHER: The time is 1:19 PM

01:19:54 22 Pacific time. We are now off the record.

01:19:59 23 (Lunch break was taken.)

02:17:28 24 THE VIDEOGRAPHER: The time is 2:17 PM

02:17:30 25 Pacific time. We are back on the record.

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02:17:33 1 MS. HAYRAPETIAN: Okay. Welcome back,  
02:17:35 2 everyone. I have a quick correction to make. Oh,  
02:17:38 3 there's an echo. Okay. Still an echo.  
02:17:50 4 MS. DIXON: She has to mute this one, I think.  
02:17:54 5 MS. HAYRAPETIAN: Okay. So maybe let's go off  
02:17:57 6 the record.  
02:17:57 7 Well, okay. That's better. Thank you.  
02:18:06 8 Just wanted to make a quick correction. 84 --  
02:18:10 9 Exhibit Number 84 is the video which is A, and 84-B is  
02:18:16 10 the transcript.  
02:18:18 11 And then I am going to add as Exhibit  
02:18:25 12 Number 85 -- and if we can please pull up Tab 60-B --  
02:18:33 13 sorry 68 --  
02:18:35 14 THE WITNESS: Can I ask a question on the  
02:18:37 15 record, real fast?  
02:18:37 16 MS. HAYRAPETIAN: Yes.  
02:18:38 17 THE WITNESS: Do I -- I do receive copies of  
02:18:39 18 these transcripts; correct?  
02:18:41 19 MS. HAYRAPETIAN: Not to take home.  
02:18:42 20 MR. HAYDEN: You can request them.  
02:18:44 21 THE WITNESS: I can request them?  
02:18:45 22 MS. HAYRAPETIAN: We can talk about it at the  
02:18:46 23 end of the depo.  
02:18:50 24 MS. DIXON: You get a copy to correct, but  
02:18:51 25 it's online; correct?

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02:18:52 1 MS. HAYRAPETIAN: I'll -- I'll do an  
02:18:53 2 admonition at the end so we can cover questions.  
02:18:59 3 STENO TECH: I cannot hear which exhibit you  
02:19:01 4 said you needed.  
02:19:02 5 MS. HAYRAPETIAN: 80 -- sorry -- 60-A.  
02:19:04 6 STENO TECH: 60-A?  
02:19:04 7 MS. HAYRAPETIAN: Uh-huh.  
02:19:12 8 STENO TECH: And which exhibit is going to be  
02:19:12 9 the -- which exhibit number -- I know it's 84-A and B,  
02:19:16 10 but which exhibit number is actually the transcript?  
02:19:17 11 Because there are quite a few here.  
02:19:19 12 MS. HAYRAPETIAN: So on the transcript it will  
02:19:21 13 reflect as 85-A, the video, which you are looking for  
02:19:26 14 60-A, Tab 60-A. And the transcript will be 85-B.  
02:19:47 15 And we're ready to play when you are.  
02:19:48 16 And I will just clarify for Mr. McDowell  
02:19:51 17 that this clip is the longer version of the excerpt from  
02:20:00 18 Exhibit 82. So we pulled --  
02:20:07 19 STENO TECH: Ma'am, I don't have a 60. The  
02:20:07 20 last number I have here is a 59-A and a 59-B. Then I  
02:20:10 21 have a Tab 5, Tab 6, Tab 7, Tab 8, Tab 9-A. I do not  
02:20:16 22 have a 60.  
02:20:19 23 MS. HAYRAPETIAN: Gabby sent it to you on the  
02:20:20 24 email.  
02:20:26 25 Let's go off the record, please.



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02:20:29 1 THE VIDEOGRAPHER: The time is 2:20  
02:20:30 2 Pacific time. We are now off the record.  
02:20:41 3 (Recess was taken.)  
02:22:37 4 THE VIDEOGRAPHER: The time is 2:22 PM  
02:22:46 5 Pacific time. We are back on the record.  
02:22:47 6 (A video clip was played.)  
02:22:54 7 (Exhibit 85-A was marked for identification.)  
02:22:54 8 (Exhibit 85-B was marked for identification.)  
02:23:56 9 BY MS. HAYRAPETIAN:  
02:23:56 10 Q Okay. So this is the extended version of  
02:23:59 11 previously marked Exhibit 82 where Mr. McDowell had a  
02:24:04 12 question as to who the "he" was.  
02:24:07 13 And the subsequent paragraph is Ms. Cooper  
02:24:13 14 talking about Mr. Daystar Peterson's filing; is that  
02:24:17 15 correct?  
02:24:19 16 A Huh?  
02:24:22 17 Q The second paragraph --  
02:24:23 18 A Uh-huh.  
02:24:24 19 Q -- on the transcript --  
02:24:25 20 A On this paper here?  
02:24:26 21 Q Yes, correct. And the video we just heard.  
02:24:29 22 A Oh, this one here?  
02:24:30 23 Q No. That one.  
02:24:34 24 A This one?  
02:24:34 25 Q Yeah.

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02:24:34 1 A Okay.

02:24:34 2 Q So the second paragraph, Ms. Cooper is talking

02:24:35 3 about Mr. Peterson, correct, on the clip we just

02:24:39 4 heard?

02:24:40 5 A It sounded like it.

02:24:42 6 Q Okay. So, going back to my question, you

02:24:45 7 said -- sorry about that.

02:25:00 8 Okay. You know Sonstar Peterson, Tory's

02:25:04 9 father; correct?

02:25:04 10 A Who.

02:25:05 11 Q Sonstar Peterson, Tory's father?

02:25:09 12 A That's his name?

02:25:12 13 Q You know him; right?

02:25:13 14 A I -- his dad?

02:25:15 15 Q Yes.

02:25:16 16 A Oh, yeah. I know who his dad is.

02:25:19 17 Q Okay. Sonstar has a close relationship with

02:25:21 18 Ms. Cooper; correct?

02:25:22 19 A I don't know nothing about any of that.

02:25:25 20 Q Did Sonstar encourage you to represent

02:25:27 21 Ms. Cooper?

02:25:29 22 A I don't know nothing about none of that.

02:25:32 23 Q Okay. Both Tory and his father wanted UTP to

02:25:36 24 represent Ms. Cooper; right?

02:25:38 25 A I know nothing about that.

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02:25:40 1 Q Did you know that Sonstar has referred to  
02:25:43 2 Ms. Cooper as his daughter?

02:25:46 3 A I know nothing about that.

02:25:48 4 Q And Sonstar also testified under oath that he  
02:25:53 5 flew Ms. Cooper out to Miami and visited Ms. Cooper in  
02:25:56 6 Houston.

02:25:57 7 Do you know about that?

02:25:58 8 A Not at all.

02:25:59 9 Q Tory has been in prison since when, to your  
02:26:04 10 knowledge?

02:26:05 11 A I don't know.

02:26:05 12 Q After the jury convicted Tory of shooting  
02:26:09 13 Ms. Pete and while he was in prison, you and Tory  
02:26:11 14 regularly spoke with one another; correct?

02:26:13 15 A I don't remember.

02:26:14 16 Q How many times have you spoken to Tory since  
02:26:16 17 his incarceration?

02:26:18 18 A I couldn't possibly tell you.

02:26:20 19 Q Could you estimate?

02:26:20 20 A No.

02:26:21 21 Q Five times?

02:26:23 22 A More.

02:26:23 23 Q Ten?

02:26:27 24 A I don't remember.

02:26:27 25 Q Fifty?

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02:26:29 1 A I don't remember.

02:26:30 2 Q Could it have been 50?

02:26:31 3 A I can't recall.

02:26:32 4 Q A hundred?

02:26:34 5 A I don't remember.

02:26:35 6 Q Okay. Is it also correct that -- sorry. Let

02:26:43 7 me go back.

02:26:43 8 Would you say you've spoken to Tory at least

02:26:46 9 25 times while he was in prison?

02:26:47 10 A I don't recall.

02:26:48 11 Q And how do you speak to Tory?

02:26:54 12 A In English.

02:26:56 13 Q Fair enough.

02:26:57 14 How do you speak to Tory while he is in

02:26:59 15 prison?

02:27:00 16 A In English.

02:27:01 17 Q What mechanism do you use to speak to Tory?

02:27:03 18 A My cell phone.

02:27:04 19 Q Okay. And where do you call Tory?

02:27:07 20 A Call Tory? He is in prison.

02:27:09 21 Q Right. But what line do you call?

02:27:12 22 A It varies.

02:27:14 23 Q Is it a phone? Is it an iPad?

02:27:16 24 A I thought -- I thought in prison they called

02:27:17 25 you?

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02:27:18 1 Q Okay. So you never called Tory.

02:27:20 2 He calls you?

02:27:21 3 A I don't remember.

02:27:22 4 Q Okay. And you understand that at the prison

02:27:29 5 Tory was at until he was stabbed, the facility gave him

02:27:32 6 a dedicated device he could use to call people outside

02:27:35 7 of prison?

02:27:36 8 A I don't know what they're doing there.

02:27:37 9 Q Okay. Tory used to call you from a device in

02:27:42 10 prison, right, on a recorded line?

02:27:46 11 A On the -- on the phone?

02:27:47 12 Q Yes.

02:27:49 13 A Yeah. I think he used a phone to call me.

02:27:52 14 Q Okay. Did he ever use, like, an iPad or

02:27:54 15 tablet with a FaceTime feature?

02:27:56 16 A I've never been in there. I don't know. I

02:27:58 17 don't know what they use.

02:27:59 18 Q Have you ever video called with Tory?

02:28:01 19 A No, not that I know of.

02:28:02 20 Q Just an audio call?

02:28:03 21 A Yeah. I don't remember anything.

02:28:05 22 Q Okay. When Tory used that prison-dedicated

02:28:12 23 device to speak with you, it would show up on your phone

02:28:15 24 as being a device furnished by the prison; correct?

02:28:18 25 A I don't know. I don't remember what it said.

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02:28:20 1 Q You don't know what number shows on your  
02:28:22 2 caller ID when Tory calls?  
02:28:24 3 A I wouldn't have remembered that.  
02:28:25 4 Q Okay. But you remember hearing that the calls  
02:28:27 5 are being monitored and recorded; right?  
02:28:30 6 A I think they say something like that.  
02:28:32 7 Q Okay. Kind of like the one we heard before  
02:28:34 8 lunch; right? The long call we heard?  
02:28:38 9 A Probably so.  
02:28:38 10 Q Okay. It is also correct that, in addition to  
02:28:41 11 the device the prison gave Tory as an inmate, Tory  
02:28:46 12 acquired a separate phone to communicate with people  
02:28:48 13 outside of prison; correct?  
02:28:50 14 A I never heard anything about that.  
02:28:51 15 Q Okay. So you've never called Tory on a  
02:28:54 16 personal cell phone in prison?  
02:28:55 17 A I don't remember anything.  
02:28:57 18 Q You understand that this phone was not  
02:29:02 19 authorized and considered a contraband phone; correct?  
02:29:07 20 A Authorized by who?  
02:29:08 21 MS. DIXON: Objection. Calls for speculation.  
02:29:09 22 And assumes facts not in evidence.  
02:29:11 23 BY MS. HAYRAPETIAN:  
02:29:12 24 Q The prison.  
02:29:15 25 A Say it again, I didn't hear you.

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02:29:17 1 Q You understand that, if Tory has a phone he is  
02:29:21 2 using in prison that was not given to him by the prison,  
02:29:24 3 it is unauthorized; right?

02:29:28 4 A I don't know what they do.

02:29:29 5 Q Okay. In your experience -- 26 years in  
02:29:34 6 prison, you said?

02:29:35 7 A Yes, ma'am.

02:29:37 8 Q Did people use contraband cell phones?

02:29:42 9 A I don't know. You'd have to ask the prison.

02:29:44 10 Q Okay. Tory used his contraband phone to  
02:29:51 11 communicate with you; correct?

02:29:54 12 MR. HAYDEN: Objection. Speculation.

02:29:55 13 THE WITNESS: I know nothing about a  
02:29:56 14 contraband cell phone.

02:29:57 15 BY MS. HAYRAPETIAN:

02:29:58 16 Q Tory has actually had more than one contraband  
02:30:02 17 cell phone, right, while he has been in prison?

02:30:04 18 MR. HAYDEN: Objection. Speculation.

02:30:05 19 THE WITNESS: I don't know anything about  
02:30:07 20 anything.

02:30:07 21 BY MS. HAYRAPETIAN:

02:30:08 22 Q So, if we consensually took a look at your  
02:30:15 23 phone, would you have the phone numbers to Tory's  
02:30:19 24 contraband phones saved in your phone book?

02:30:21 25 A He has contraband phones? Does he?

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02:30:26 1 Q I don't know.

02:30:27 2 Does he?

02:30:28 3 A I've never heard of that.

02:30:30 4 Q You've never heard of that. Okay.

02:30:31 5 You didn't help him obtain a contraband cell

02:30:33 6 phone?

02:30:34 7 MR. HAYDEN: Objection. Speculation.

02:30:36 8 THE WITNESS: I don't know nothing about what

02:30:37 9 you are talking about. Help him obtain a -- I don't

02:30:39 10 know anything about that.

02:30:41 11 BY MS. HAYRAPETIAN:

02:30:41 12 Q It's a yes-or-no question.

02:30:42 13 MS. DIXON: Objection. Also it's a Fifth

02:30:44 14 Amendment violation. He doesn't have to answer because

02:30:46 15 it's his phone.

02:30:47 16 MS. HAYRAPETIAN: Oh. Are you his lawyer now?

02:30:50 17 MS. DIXON: I'm a lawyer, and I'm here.

02:30:52 18 MS. HAYRAPETIAN: But are you his lawyer?

02:30:54 19 MS. DIXON: I don't have to be his lawyer to

02:30:55 20 make an objection. I'm Milagro's lawyer. I'm here

02:30:58 21 appropriately.

02:30:59 22 MS. HAYRAPETIAN: Okay. So whose -- I'm just

02:30:59 23 curious, whose Fifth Amendment right are you invoking

02:31:02 24 over there?

02:31:04 25 MS. DIXON: I'm letting him know he can take



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02:31:06 1 the Fifth Amendment, if he wants to.

02:31:07 2 MS. HAYRAPETIAN: Okay.

02:31:08 3 MR. HAYDEN: Object to speculation. Also add  
02:31:10 4 Fifth Amendment.

02:31:11 5 MS. HAYRAPETIAN: Okay. So my understanding  
02:31:13 6 is that Mr. McDowell is represented by  
02:31:16 7 Mr. Michael Hayden from Unite the People. If that has  
02:31:18 8 changed since the lunch break, please let me know, and  
02:31:21 9 let's correct the appearances on the record.

02:31:23 10 MS. DIXON: Here is the problem: He was prior  
02:31:25 11 counsel; so his team was prior counsel. That means that  
02:31:29 12 as a successor in interest, I do have an interest in his  
02:31:32 13 testimony, especially if it has anything to do with my  
02:31:35 14 client. And that's why he is here because supposedly  
02:31:37 15 it's relevant to your complaint.

02:31:40 16 MS. HAYRAPETIAN: Okay. So you are saying you  
02:31:41 17 guys have a common interest agreement?

02:31:43 18 MS. DIXON: Yes. I don't have an agreement.  
02:31:44 19 I just -- it's just obviously -- I don't have any  
02:31:47 20 agreement with him, but I didn't say that.

02:31:54 21 BY MS. HAYRAPETIAN:

02:31:55 22 Q Do you know the PIN code to Tory's contraband  
02:32:01 23 phones?

02:32:04 24 A I don't know anything what you are talking  
02:32:05 25 about. I've never heard of a contraband phone.

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02:32:08 1 Q Okay. Is your cell phone number  
02:32:11 2 (562) 355-0834?  
02:32:15 3 A No.  
02:32:15 4 Q What is your cell phone number?  
02:32:17 5 A I don't know. That's not it. Call that  
02:32:21 6 number right now. See if my phone rings. Let's do it  
02:32:25 7 on video.  
02:32:25 8 Q So what is your cell phone number?  
02:32:27 9 A I don't know. I don't know if I should give  
02:32:29 10 that out. That's kind of personal.  
02:32:31 11 Q Was this ever your cell phone number:  
02:32:33 12 (562) 355-0834?  
02:32:37 13 A Yes.  
02:32:37 14 Q When was it your cell phone number?  
02:32:39 15 A I don't remember.  
02:32:40 16 Q How many years do you think you had that  
02:32:41 17 cell phone number for?  
02:32:42 18 A I don't remember.  
02:32:43 19 Q Why did you change it?  
02:32:45 20 A I don't remember.  
02:32:45 21 Q Okay. Did you also get a new phone when you  
02:32:52 22 changed your number?  
02:32:54 23 A Did I get who?  
02:32:55 24 Q A new phone when you changed your number?  
02:32:57 25 A I don't remember what they did.

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02:32:58 1 MR. HAYDEN: Objection. Relevance.

02:33:04 2 MS. HAYRAPETIAN: Okay. I'm going to mark for

02:33:06 3 the record Exhibit 86, and I need Tab 42, please.

02:33:24 4 STENO TECH: Just a moment. Getting that

02:33:25 5 done.

02:33:42 6 THE WITNESS: This is nice paper.

02:33:44 7 MS. DIXON: What number is this one?

02:33:45 8 MS. HAYRAPETIAN: 86.

02:33:46 9 MS. DIXON: 86? Okay.

02:33:53 10 STENO TECH: Let me know when you need me to

02:33:54 11 scroll, ma'am.

02:33:58 12 MS. HAYRAPETIAN: Stay here for just a second.

02:33:59 13 (Exhibit 86 was marked for identification.)

02:33:59 14 BY MS. HAYRAPETIAN:

02:34:00 15 Q All right. So these are calls we -- this

02:34:05 16 is -- first of all, this is a document we received from

02:34:07 17 the prison in response to a subpoena request, and these

02:34:11 18 are calls between you and Tory from October 2023 to

02:34:16 19 December 2024.

02:34:19 20 And looking on page 1, where it says

02:34:22 21 destination number -- it's that (563) 355-0834 number we

02:34:29 22 just discussed -- that was your prior phone number;

02:34:32 23 correct?

02:34:33 24 A I don't know where you're at.

02:34:37 25 Q Page 1. The first page.

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02:34:38 1 A Page 1 is what?

02:34:40 2 Q Let's look at page 1 --

02:34:41 3 A Sure.

02:34:41 4 Q -- where it says destination number. It's,

02:34:43 5 like, the third line from the bottom.

02:34:45 6 A From the bottom? Okay.

02:34:47 7 Q And then it says the phone number we were just

02:34:49 8 discussing as your prior phone number -- (562) 355-0834.

02:34:56 9 Okay. So there's 97 calls over 14 months.

02:35:06 10 And you can see that if you go to the last page where

02:35:14 11 the total number of calls is listed.

02:35:17 12 Do you see that?

02:35:19 13 A Sure.

02:35:19 14 Q Okay. So you talked to Tory about twice a

02:35:21 15 week for over a year; correct?

02:35:24 16 A I don't remember.

02:35:26 17 Q Luckily, we have it in front of us.

02:35:31 18 A It's something. I don't know if that's me

02:35:32 19 talking to him. I don't see any pictures or anything

02:35:35 20 like that, but I do see a phone number there.

02:35:37 21 Q Right. So these are the records from the

02:35:39 22 prison of your phone number speaking with Tory Lanez 97

02:35:44 23 times over 14 months.

02:35:47 24 A I don't know.

02:35:49 25 Q Okay.

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02:35:51 1 MS. HAYRAPETIAN: Let's mark as Exhibit 87,  
02:35:53 2 Tab 16, please.  
02:36:00 3 (Exhibit 87 was marked for identification.)  
02:36:30 4 BY MS. HAYRAPETIAN:  
02:36:30 5 Q So these are records AT&T in response to our  
02:36:38 6 subpoena of Ms. Milagro Cooper's cell phone, and these  
02:36:49 7 show 73 calls between you and Ms. Cooper from  
02:36:52 8 October 2024 to March '25.  
02:36:56 9 A It shows what?  
02:36:58 10 Q 73 calls between you and Ms. Cooper from  
02:37:02 11 October 2024 to March 2025.  
02:37:06 12 A Okay.  
02:37:07 13 Q And if you --  
02:37:08 14 A I don't remember much, but that, for sure, is  
02:37:12 15 really weird.  
02:37:13 16 You said 90-something calls?  
02:37:15 17 Q No. 73.  
02:37:17 18 A 73 calls?  
02:37:18 19 Q Yeah. 97 were with Tory.  
02:37:20 20 A Wow.  
02:37:22 21 Q And that's, again, your number that we  
02:37:24 22 discussed -- (563) 355-0834.  
02:37:31 23 A I got to say something. You guys made this  
02:37:33 24 up. Somebody made this up. There's no way in the world  
02:37:36 25 that I talked to her 73 times. That's impossible.

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02:37:41 1 Q Well, these are the records we received from  
02:37:43 2 AT&T.

02:37:45 3 A Somebody is lying.

02:37:46 4 Q Your counsel has had copies of these records  
02:37:50 5 since they were produced by AT&T. And they have --

02:37:53 6 A I hear what you are saying, but I'm telling  
02:37:55 7 you, either AT&T or somebody in y'all camp is lying.  
02:37:59 8 There's no way in the world I've talked to her 73 times.  
02:38:02 9 It's impossible.

02:38:04 10 Q So why would AT&T lie?

02:38:06 11 A Or your guys's law firm. There's no way I've  
02:38:09 12 talked to her 73 times. And we can go ahead and get  
02:38:11 13 back to the questioning, but that's super false.

02:38:13 14 If I handed you a piece of paper and said you  
02:38:16 15 called her 73 times, and you knew good and well you  
02:38:19 16 ain't never called her 73 times, would you say  
02:38:20 17 something?

02:38:21 18 Q So, let's actually stay here. I want to know  
02:38:24 19 why you think someone at AT&T or our firm would have  
02:38:27 20 fabricated this evidence.

02:38:28 21 A I don't know. But I know I ain't talking to  
02:38:31 22 nobody no 73 times. I do know that, and I'll stand on  
02:38:34 23 that.

02:38:34 24 Q Okay. But that is the number we discussed;  
02:38:37 25 right? Originating number, right here, it says

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02:38:39 1 (562) 355-0834; right?

02:38:44 2 A I see (281) 640-4536.

02:38:51 3 Q Well, that's where you the call goes.

02:38:52 4 A It says originating number.

02:38:54 5 Q Well, which number are you looking at?

02:38:55 6 A I'm looking right here, right on your list

02:38:57 7 that says originating number.

02:38:59 8 Q Right.

02:38:59 9 A And so let's see how many times this says.

02:39:01 10 Maybe you looked at it wrong. Let's check your

02:39:04 11 homework.

02:39:05 12 Q So --

02:39:06 13 A So hold on. If this says 73 -- if this says

02:39:10 14 73, that means you are quoting it wrong. There it goes.

02:39:13 15 So do your homework now. And your quoting it wrong.

02:39:17 16 Q Which part was wrong?

02:39:18 17 A Because where it says originating number, that

02:39:21 18 is -- oh, the term.

02:39:22 19 So you are saying that she called me back and

02:39:24 20 forth?

02:39:25 21 Q Uh-huh. Correct.

02:39:25 22 A Not I called her those times.

02:39:27 23 Q Correct. You guys spoke --

02:39:28 24 A I still don't believe that.

02:39:29 25 Q -- you guys spoke 73 times.

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02:39:31 1 A I still don't believe that. I still don't  
02:39:31 2 believe that but go ahead. We'll go ahead. I'm sorry  
02:39:33 3 for interrupting.  
02:39:33 4 Q Okay. Apologies if I misstated --  
02:39:38 5 A Sure.  
02:39:38 6 Q -- but, yes, it's 73 calls between you and  
02:39:42 7 Ms. Cooper.  
02:39:43 8 A I think still that's wrong.  
02:39:44 9 Q Okay. Well, this is the sheet we have from  
02:39:47 10 AT&T.  
02:39:48 11 A All right. Let's go.  
02:39:49 12 Q And our firm did not make it.  
02:39:51 13 A Are you sure?  
02:39:52 14 Q I'm positive.  
02:39:53 15 A How -- how are you sure?  
02:39:54 16 Q I'm positive.  
02:39:55 17 A Okay.  
02:39:56 18 Q Because these were in response --  
02:39:57 19 A You watch everybody at your firm?  
02:39:58 20 Q This was in response to a subpoena response  
02:40:01 21 that was produced to our firm --  
02:40:03 22 A It's still wrong.  
02:40:04 23 Q -- and your lawyers.  
02:40:06 24 A Okay.  
02:40:06 25 Q Okay. So 97 calls with Tory. 73 calls with



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02:40:13 1 Ms. Cooper.

02:40:15 2 During this lawsuit, you talked to Ms. Cooper

02:40:18 3 weekly; correct?

02:40:19 4 A Not at all.

02:40:21 5 Q Okay. So let's focus on this October to

02:40:24 6 December 2024 period right after the lawsuit was filed.

02:40:28 7 During those two months, you spoke to Tory about 40

02:40:32 8 times based on these records. And during those same

02:40:38 9 two months, you spoke to Ms. Cooper 50 times.

02:40:43 10 MR. HAYDEN: Objection. Relevance.

02:40:45 11 BY MS. HAYRAPETIAN:

02:40:45 12 Q You were talking to both of them about

02:40:48 13 Ms. Pete during this period; correct?

02:40:51 14 MR. HAYDEN: Objection. Speculation.

02:40:52 15 THE WITNESS: Not at all.

02:40:52 16 BY MS. HAYRAPETIAN:

02:40:53 17 Q So in -- at least 50 calls, not once did you

02:40:57 18 discuss Megan Pete?

02:41:00 19 A I don't remember.

02:41:01 20 Q Are you telling me that in 50 calls with

02:41:07 21 Ms. Cooper you never once passed along information about

02:41:10 22 Ms. Pete from Tory?

02:41:13 23 MR. HAYDEN: Objection. Speculation.

02:41:14 24 THE WITNESS: I don't remember.

02:41:15 25 BY MS. HAYRAPETIAN:

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02:41:15 1 Q You are saying you created a solid wall  
02:41:21 2 between what Tory told you and what you told Ms. Cooper?  
02:41:27 3 A I don't remember.  
02:41:28 4 Q Okay. So when Tory gave you information about  
02:41:32 5 Ms. Pete, that information just stopped with you?  
02:41:34 6 MR. HAYDEN: Objection. Speculation.  
02:41:36 7 THE WITNESS: I never said nobody gave me  
02:41:38 8 information about nothing. I don't remember nothing  
02:41:40 9 about what you are talking about.  
02:41:42 10 BY MS. HAYRAPETIAN:  
02:41:42 11 Q Did your conversations with Tory -- did the  
02:41:52 12 subject of your conversations with Tory make its way to  
02:41:55 13 Ms. Cooper through you?  
02:41:59 14 A I don't know what you are talking about.  
02:42:01 15 Q Did Tory --  
02:42:01 16 A I don't remember none of that. Nothing. I  
02:42:04 17 don't remember none of that.  
02:42:05 18 Q Okay. Did Tory ever tell you what he ate?  
02:42:12 19 MR. HAYDEN: Objection. Relevance.  
02:42:13 20 THE WITNESS: I don't remember.  
02:42:19 21 MS. HAYRAPETIAN: Okay. Let's pull up  
02:42:21 22 Tab 11-A and mark it as Exhibit 88-A, and I would also  
02:42:26 23 like to mark the transcript of the recording as 88-B.  
02:42:58 24 STENO TECH: What's the tab you need?  
02:42:58 25 MS. HAYRAPETIAN: 11-A.

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02:42:58 1 STENO TECH: 11-A. Okay. Thank you. I'm on  
02:42:58 2 it.  
02:42:58 3 THE WITNESS: I'm going to have to get out of  
02:43:00 4 here in about 18 minutes.  
02:43:02 5 MS. HAYRAPETIAN: What does that mean?  
02:43:02 6 THE WITNESS: I have to leave in about  
02:43:02 7 18 minutes.  
02:43:02 8 MS. HAYRAPETIAN: Leave for where?  
02:43:03 9 THE WITNESS: I have a family situation I got  
02:43:04 10 to take care of.  
02:43:06 11 MS. HAYRAPETIAN: Mr. Hayden?  
02:43:07 12 MR. HAYDEN: Can we get off the record?  
02:43:09 13 MS. HAYRAPETIAN: Actually, I would like this  
02:43:10 14 conversation to stay on the record, if that's okay.  
02:43:13 15 MR. HAYDEN: I would rather get through this  
02:43:14 16 today, because we will be court-ordered to come back.  
02:43:18 17 THE WITNESS: I hear you. It doesn't change  
02:43:20 18 what I said, though. I still got something I got to  
02:43:24 19 take care of; so we just come back Monday and hang out  
02:43:26 20 again.  
02:43:27 21 MS. HAYRAPETIAN: We actually cannot.  
02:43:29 22 THE WITNESS: Well, if I got to leave 'cause  
02:43:31 23 of a family situation, at -- at one point, it's going to  
02:43:35 24 have to end.  
02:43:38 25 MS. HAYRAPETIAN: And -- okay. Let's play the

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02:43:47 1 recording, please.

02:43:48 2 (A video clip was played.)

02:44:12 3 THE WITNESS: Did you want me to play it?

02:44:17 4 MS. HAYRAPETIAN: Court Reporter -- sorry.

02:44:17 5 Ms. Thrash, can we play the recording?

02:44:21 6 STENO TECH: Yes, I was playing it.

02:44:23 7 You guys can't hear it?

02:44:24 8 MS. HAYRAPETIAN: No.

02:44:25 9 STENO TECH: Okay. Just a moment, please.

02:44:26 10 Let me see what's going on.

02:44:30 11 MR. HAYDEN: TV volume maybe.

02:44:31 12 MS. HAYRAPETIAN: No. It was working a second

02:44:33 13 ago.

02:45:00 14 THE WITNESS: You guys want my help?

02:45:01 15 MS. HAYRAPETIAN: No. It's fine. I'm -- I'm

02:45:02 16 just going to play it myself.

02:45:04 17 THE WITNESS: Okay.

02:45:06 18 (A video clip was played.)

02:45:10 19 STENO TECH: Can you hear it now?

02:45:12 20 MS. HAYRAPETIAN: Yes.

02:45:13 21 STENO TECH: Okay.

02:45:14 22 (A video clip was played.)

02:45:14 23 (Exhibit 88-A was marked for identification.)

02:45:14 24 (Exhibit 88-B was marked for identification.)

02:45:33 25 BY MS. HAYRAPETIAN:

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02:45:33 1 Q So this is a November 15, 2023, phone call  
02:45:36 2 between you and Tory. And he stated, "You've got the  
02:45:41 3 Megan bitch trying to make it seem like, or the  
02:45:44 4 Meghann Cuniff lady trying to make it seem like we don't  
02:45:48 5 know what we're doing, which is fine. Because I love  
02:45:50 6 being the underdogs. But I love being the underdog who  
02:45:53 7 wins the race. And my thing is just, like, if this can  
02:45:57 8 help us win the race, then let's use everything that we  
02:46:00 9 can use to win the race."

02:46:02 10 What race is Tory talking about winning?

02:46:04 11 A I don't remember.

02:46:06 12 Q When Tory says, "let's use everything that we  
02:46:08 13 can," what's he referring to?

02:46:10 14 A I don't remember.

02:46:11 15 Q When Tory says, "if this can help us," what's  
02:46:14 16 "this"?

02:46:16 17 A I don't remember.

02:46:16 18 Q Who is Meghann Cuniff?

02:46:19 19 A I don't remember.

02:46:20 20 Q Meghann Cuniff was a journalist writing about  
02:46:25 21 Tory's conviction; right?

02:46:27 22 A I don't remember.

02:46:27 23 Q And she was also writing about the testimony  
02:46:29 24 Ms. Pete gave, including that Tory shot her; correct?

02:46:32 25 A I don't remember.

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02:46:34 1 Q In this November 15, 2023, conversation with  
02:46:37 2 Tory, you and Tory are talking about the public  
02:46:40 3 relations strategy; correct?

02:46:41 4 A I don't remember.

02:46:42 5 Q When Tory was telling you about his desire to,  
02:46:45 6 quote, "win the race," he was talking about his desire  
02:46:48 7 to convince people he didn't shoot Ms. Pete; right?

02:46:51 8 A I don't remember.

02:46:51 9 Q In November 20- -- in this November 2023  
02:46:54 10 conversation, you and Tory are talking about shaping the  
02:46:57 11 public narrative about whether he shot Ms. Pete;  
02:46:59 12 correct?

02:46:59 13 MR. HAYDEN: Objection. Speculation.

02:47:02 14 THE WITNESS: I don't remember.

02:47:02 15 BY MS. HAYRAPETIAN:

02:47:03 16 Q If that's not what you are talking about, then  
02:47:05 17 what did Tory mean by "win the race"?

02:47:09 18 A I don't remember.

02:47:10 19 Q The plan was for Tory to give you information  
02:47:12 20 that you would pass to Ms. Cooper for her social media;  
02:47:15 21 correct?

02:47:15 22 MR. HAYDEN: Objection. Speculation.

02:47:17 23 THE WITNESS: I don't remember.

02:47:17 24 BY MS. HAYRAPETIAN:

02:47:18 25 Q In Tory's own words he was willing to, quote,

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02:47:21 1 "use everything that he can use to win the race." That  
02:47:26 2 is, to convince everyone that he didn't shoot Ms. Pete  
02:47:28 3 correct?

02:47:29 4 MR. HAYDEN: Objection. Speculation.

02:47:30 5 THE WITNESS: I don't remember.

02:47:31 6 BY MS. HAYRAPETIAN:

02:47:32 7 Q To use everything -- to that end, Tory wanted  
02:47:34 8 you to communicate information from him to Ms. Cooper to  
02:47:36 9 share with her followers on social media; right?

02:47:39 10 MR. HAYDEN: Objection. Speculation.

02:47:40 11 THE WITNESS: I don't remember.

02:47:40 12 BY MS. HAYRAPETIAN:

02:47:41 13 Q And you were willing to do so; right?

02:47:43 14 MR. HAYDEN: Objection. Speculation.

02:47:44 15 THE WITNESS: I don't remember.

02:47:45 16 BY MS. HAYRAPETIAN:

02:47:45 17 Q And you did so; right?

02:47:46 18 MR. HAYDEN: Same objection.

02:47:48 19 THE WITNESS: I don't remember.

02:47:52 20 MS. HAYRAPETIAN: Okay. Let's mark as  
02:47:53 21 Exhibit 89, Tab 38-A.

02:48:17 22 STENO TECH: Do you want me to play it?

02:48:19 23 MS. HAYRAPETIAN: Yes, please.

02:48:20 24 (A video clip was played.)

02:48:24 25 MS. DIXON: What number is this?

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02:48:34 1 MS. HAYRAPETIAN: Can we please play 38-A?

02:48:37 2 STENO TECH: Yes, ma'am. I'm coming. Yes,

02:48:38 3 ma'am. Give me just a moment, please.

02:48:39 4 MS. HAYRAPETIAN: Thank you.

02:48:45 5 STENO TECH: It just downloading.

02:49:25 6 (A video clip was played.)

02:49:25 7 (Exhibit 89-A was marked for identification.)

02:49:25 8 (Exhibit 89-B was marked for identification.)

02:49:28 9 BY MS. HAYRAPETIAN:

02:49:29 10 Q So, on December 17, 2023, you had a phone call

02:49:30 11 with Tory, during which you discussed both Ms. Cooper

02:49:32 12 and Ms. Pete.

02:49:33 13 Tory said, quote, "The only name she was just

02:49:36 14 a fucking, just a fucking, was just a girl coming on

02:49:39 15 Instagram Live."

02:49:41 16 You responded, "Oh, with, I forgot that girl's

02:49:45 17 name, the -- it was the Milagro one. You talking about

02:49:47 18 that one?"

02:49:48 19 Then Tory exclaimed, "No. I'm talking about

02:49:50 20 the girl, the girl from the whole case. Like Megan, I'm

02:49:54 21 talking about her."

02:49:55 22 When Tory said, "girl coming on Instagram

02:49:58 23 Live," you immediately thought it was Ms. Cooper; right?

02:50:02 24 A I don't remember.

02:50:03 25 Q Well, you just heard your voice, and your



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02:50:07 1 immediate reaction was "it was the Milagro one"; right?

02:50:09 2 We heard that?

02:50:11 3 A I don't know.

02:50:12 4 Q Did you not just hear that?

02:50:13 5 A I heard it.

02:50:13 6 Q Okay. So you did hear it?

02:50:15 7 A But I don't remember what -- you said my first

02:50:17 8 thought. I don't know what my first thought was.

02:50:19 9 Q Sure. But you -- you saw your response --

02:50:20 10 your immediate response to Tory was Milagro; right?

02:50:23 11 A Oh, I heard that.

02:50:24 12 Q Yeah. Okay.

02:50:29 13 But Tory was actually talking about Ms. Pete;

02:50:31 14 correct?

02:50:32 15 A I don't know. I don't remember.

02:50:33 16 Q Well, we just listened together that he said

02:50:35 17 "No. I'm talking about the girl from the whole case.

02:50:38 18 Megan"?

02:50:40 19 A Okay. I don't remember. You said Ms. Pete.

02:50:43 20 I don't remember if he was talking about Megan -- Megan

02:50:46 21 who?

02:50:46 22 Q So "the girl from the whole case. Megan."

02:50:50 23 A What case?

02:50:50 24 Q That's his words.

02:50:51 25 A What case.

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02:50:53 1 Q What case?

02:50:53 2 A You're -- you're trying to tell me what case  
02:50:55 3 he is talking about right here, and I don't know what  
02:50:57 4 case he is talking about.

02:50:58 5 What case? How do you know? You know for  
02:51:00 6 sure he is talking about this case, or is there a  
02:51:02 7 percentage it could be somebody else? I don't know. I  
02:51:04 8 don't remember.

02:51:05 9 Q What other cases would you be talking to Tory  
02:51:07 10 about?

02:51:07 11 A I don't know. I don't remember. I'm sure  
02:51:09 12 we've talked about quite a few.

02:51:10 13 Q Of his own cases? I thought you said he  
02:51:12 14 didn't have other cases?

02:51:13 15 A I don't know if he has cases. Say that again.

02:51:15 16 Q I thought you said you don't know?

02:51:17 17 A I just said I don't know about him having  
02:51:19 18 other cases, but I don't know what case he is talking  
02:51:20 19 about here.

02:51:21 20 Q What case did you represent Tory in or your --

02:51:22 21 A Why are you saying "represent"? He didn't say  
02:51:24 22 anything about representing, from what I heard on the  
02:51:26 23 tape you just played.

02:51:27 24 What I heard was -- which is on the paper.

02:51:29 25 And what I'm telling you is I don't remember.

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02:51:31 1 I don't personally know what he was talking about at  
02:51:34 2 that time in 2023, or whatever date you said it was.

02:51:37 3 Q But I have a question for you.

02:51:38 4 A Sure.

02:51:39 5 Q So what case do you and Unite the People  
02:51:44 6 represent Tory in?

02:51:47 7 A What case did we represent him in?

02:51:49 8 Q Correct. He was your client; right?

02:51:51 9 A Sure. Yeah.

02:51:53 10 Q And what case?

02:51:58 11 A I think the case we represented him on -- and  
02:52:01 12 I'm not quite sure -- it was -- oh, okay. It was the  
02:52:04 13 Daystar Peterson case. I remember that. That was the  
02:52:07 14 case we represented him.

02:52:09 15 Q Daystar Peterson and what?

02:52:12 16 A I think he hired us for his case. I didn't  
02:52:14 17 think there was anybody else included in his retainer  
02:52:17 18 for our case.

02:52:22 19 Good one. That was a good one.

02:52:26 20 Q What case did you work on for Tory?

02:52:30 21 A The Daystar Peterson case.

02:52:32 22 Q And who -- against who?

02:52:33 23 A The State of California.

02:52:34 24 Q Okay. Which was about the shooting of  
02:52:36 25 Ms. Pete; correct?

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02:52:37 1 A Oh. I don't remember that. But I remember it  
02:52:39 2 was Daystar Peterson verse the State of California on  
02:52:42 3 the paperwork.

02:52:43 4 Q Okay. So CEO of UTP has a case for a client,  
02:52:47 5 Tory Lanez, he knows that the case is State of  
02:52:50 6 California versus Daystar Peterson, but he cannot  
02:52:53 7 remember --

02:52:55 8 A Yes. Right.

02:52:55 9 Q -- what the underlying cause of action is?

02:52:59 10 A The underlying cause of action.

02:53:00 11 Q Did I get that correct?

02:53:02 12 A You did good, but I don't know. I don't  
02:53:04 13 remember --

02:53:04 14 Q Okay.

02:53:04 15 A -- what the underlying cause of action. You  
02:53:06 16 are asking me to remember something.

02:53:08 17 What I remember was it was a  
02:53:09 18 Daystar Peterson -- the State of California versus  
02:53:11 19 Daystar Peterson. They didn't put any underlying  
02:53:15 20 actions in the subject titles.

02:53:17 21 Q So what was Tory being accused of in that  
02:53:19 22 case?

02:53:22 23 A I don't really recall.

02:53:24 24 Q And you don't recall what he is serving a  
02:53:26 25 prison sentence for?

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02:53:29 1 A I served for being Black. I don't know what  
02:53:32 2 he is serving for. I don't recall exactly the charges.  
02:53:35 3 Q Okay. So your initial thought here -- or your  
02:53:48 4 response here to say Milagro, in response to Tory  
02:53:51 5 talking about Instagram Live, was Ms. Cooper because she  
02:53:56 6 repeatedly posts on social media about the shooting;  
02:54:01 7 correct?  
02:54:03 8 A I don't remember.  
02:54:04 9 Q And you helped coordinate what information  
02:54:08 10 gets from Tory to Ms. Cooper; right?  
02:54:10 11 MR. HAYDEN: Objection. Speculation.  
02:54:12 12 THE WITNESS: Not at all.  
02:54:14 13 MS. HAYRAPETIAN: Let's mark as Exhibit 90,  
02:54:16 14 Tab 50-A, please, and B will be the transcript.  
02:54:25 15 STENO TECH: Yes, ma'am. It will be just a  
02:54:25 16 minute.  
02:55:21 17 (A video clip was played.)  
02:55:32 18 (Exhibit 90-A was marked for identification.)  
02:55:32 19 (Exhibit 90-B was marked for identification.)  
02:56:12 20 BY MS. HAYRAPETIAN:  
02:56:13 21 Q Okay. So, on November 15, 2024, you had a  
02:56:15 22 call with Tory over the prison phone; and as we just  
02:56:17 23 heard, during that call, you discussed this case that,  
02:56:21 24 quote, "lawyers from Roc Nation," quote, brought against  
02:56:25 25 Ms. Cooper.

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02:56:26 1 Tory asked you whether Roc Nation said, quote,  
02:56:28 2 "some weird shit about him too," quote.

02:56:32 3 To which you responded that, quote, "They were  
02:56:35 4 saying she," as in Ms. Cooper, "was communicating with  
02:56:39 5 you or some bullshit," quote.

02:56:41 6 Tory then said, quote, "The funniest thing  
02:56:45 7 about that is when they go looking, and they find  
02:56:49 8 nothing. They're going to be like, what," end quote.

02:56:54 9 The "she" you were referring to was  
02:56:56 10 Ms. Cooper; right?

02:56:57 11 A I don't remember.

02:56:58 12 Q You call that claim "bullshit"; correct?

02:57:01 13 A That's what it says.

02:57:04 14 Q And Ms. Cooper was communicating with Tory,  
02:57:06 15 wasn't she?

02:57:08 16 MR. HAYDEN: Objection. Speculation.

02:57:12 17 THE WITNESS: Is that a question?

02:57:12 18 BY MS. HAYRAPETIAN:

02:57:13 19 Q Yeah.

02:57:13 20 A I don't remember.

02:57:14 21 Q You don't remember if --

02:57:16 22 A I already said that. I thought you were  
02:57:17 23 saying something else. No, I don't remember that.

02:57:20 24 MS. HAYRAPETIAN: Okay. So I would like to  
02:57:21 25 mark as Exhibit 91, Tab 12.

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02:57:44 1 (Exhibit 91 was marked for identification.)

02:57:44 2 BY MS. HAYRAPETIAN:

02:57:45 3 Q And this is a September 17, 2020, Instagram DM

02:57:49 4 produced from Ms. Cooper's phone. And it's a DM on

02:57:52 5 Instagram, Direct Message, from Tory Lanez to

02:57:54 6 Milagro Cooper.

02:57:55 7 And he says, "Send me your number, Mil." And

02:58:00 8 then Ms. Cooper provides her number.

02:58:04 9 And then there's a third message from

02:58:06 10 Ms. Cooper which states, "I don't know how your energy

02:58:10 11 is, but everything's been so crazy that I can only

02:58:13 12 imagine. I don't know how you are doing your live

02:58:15 13 tonight, but if you gave me that or any exclusive, it'd

02:58:19 14 change my life. I've been dying to know why you asked

02:58:22 15 for my number. Regardless of whatever you do, and how

02:58:25 16 you do it, you are not a throw away. No judgment holds

02:58:29 17 weight to that of The Most High. I wish you the best."

02:58:37 18 So Tory asked Ms. Cooper for her phone number,

02:58:43 19 right, in this DM?

02:58:44 20 A I don't know how this piece of paper that

02:58:45 21 somebody's printed -- I don't know. Anybody could have

02:58:47 22 drew this; right?

02:58:48 23 Q Right. So I'm asking -- okay. Well, it's

02:58:49 24 been produced from her cell phone. And all I'm asking

02:58:52 25 you to do is look at it and answer along.

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02:58:55 1 A Oh, okay.

02:58:56 2 Q Okay. So you can see there, in that

02:58:58 3 screenshot of the DM, Tory is asking Ms. Cooper for her

02:59:02 4 phone number; correct?

02:59:03 5 A I don't know. On this paper, somebody said

02:59:05 6 something.

02:59:05 7 Q Okay. And that somebody up top shows --

02:59:08 8 A What's the date?

02:59:09 9 Q I --

02:59:10 10 A I don't see a date on here.

02:59:11 11 Q Well, I told you it was September 17, 2020,

02:59:13 12 and you could see it says September 17, right there.

02:59:16 13 A Was I home from prison?

02:59:22 14 I don't know nothing about this.

02:59:26 15 Q Following along.

02:59:27 16 A I am.

02:59:28 17 Q Okay. So you can see the first message,

02:59:29 18 right, asking for Milagro's phone number?

02:59:32 19 A No.

02:59:33 20 Q You don't see it?

02:59:33 21 A No. I see something that says, "Send me your

02:59:37 22 number, Mil."

02:59:38 23 Q Right. And Ms. Cooper responds, with her

02:59:40 24 cell phone number.

02:59:41 25 You see that?



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02:59:41 1 A I don't know who responded, but I see a  
02:59:43 2 cell phone number.

02:59:45 3 Q Great. So people ask for phone numbers when  
02:59:49 4 they want to communicate directly; correct?

02:59:51 5 A I don't know. They could have been doing  
02:59:53 6 anything.

02:59:54 7 Q Okay. So Tory and Ms. Cooper were  
02:59:56 8 communicating directly, weren't they?

02:59:59 9 A I don't know.

03:00:00 10 Q Ms. Cooper responded that it would change her  
03:00:02 11 life if Tory gave her an exclusive with him. An  
03:00:06 12 exclusive live stream opportunity or podcast with Tory  
03:00:09 13 would be a significant boost to Ms. Cooper's social  
03:00:12 14 media business; right?

03:00:13 15 A I don't know.

03:00:18 16 MS. HAYRAPETIAN: Let's look at Tab 13 as  
03:00:21 17 Exhibit Number 92.

03:00:34 18 (Exhibit 92 was marked for identification.)

03:00:34 19 BY MS. HAYRAPETIAN:

03:00:34 20 Q This is yet another DM from Tory to  
03:00:36 21 Milagro Cooper. This was produced by the defendant  
03:00:42 22 herself, and it's a December 13, 2022, message which I  
03:00:46 23 think we've all established you were outside of prison,  
03:00:48 24 given you were at trial -- Tory's trial.

03:00:51 25 And this is actually right as Tory's trial had

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03:00:55 1 started. And he is messaging Milagro Cooper on  
03:00:59 2 Instagram and saying, "What's ya number? Gotta ask you  
03:01:01 3 something." And then again, Ms. Cooper provides her  
03:01:04 4 number.

03:01:06 5 Do you see that in front of you?

03:01:07 6 A I see a piece of paper that's got a bunch of  
03:01:10 7 stuff. I can make this at the house. So, yeah, I see  
03:01:12 8 it on a piece of paper, what you are saying.

03:01:15 9 Q Do you frequently forge Instagram DMs?

03:01:18 10 A No. But you can AI this. You can do all  
03:01:20 11 stuff with this.

03:01:22 12 Q Do you frequently AI things?

03:01:24 13 A I AI a lot of stuff.

03:01:25 14 Q Were you the one who AI'd Ms. Pete's porn  
03:01:28 15 video?

03:01:28 16 A Ms. Pete's porn video?

03:01:28 17 MR. HAYDEN: Objection. Speculation.

03:01:30 18 MS. DIXON: Objection. Speculation.

03:01:31 19 THE WITNESS: Ms. Pete had a porn video?

03:01:33 20 BY MS. HAYRAPETIAN:

03:01:33 21 Q You took on Ms. Cooper's case; right? And you  
03:01:35 22 know one of the charges is an AI deepfake pornographic  
03:01:39 23 video; right?

03:01:40 24 A Is it? What was in the video?

03:01:42 25 Q I'm not sure.

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03:01:42 1 A Oh. Either am I.

03:01:44 2 Q Okay. So you didn't make the AI porn video of

03:01:47 3 Ms. Cooper?

03:01:48 4 A I didn't know there was one.

03:01:50 5 Q Sorry. Of Ms. Pete.

03:01:51 6 A I didn't know there was one.

03:01:52 7 Q Okay. So you usually take on cases at UTP,

03:01:55 8 and you don't read the complaints of the cases you take

03:01:57 9 on.

03:01:58 10 Is that what I'm hearing?

03:01:59 11 A I didn't pass the bar. I don't know what

03:02:00 12 year, but I didn't pass the bar.

03:02:03 13 Q Okay.

03:02:05 14 MS. HAYRAPETIAN: Let's mark as Exhibit

03:02:06 15 Number 93, Tab 14.

03:02:24 16 (Exhibit 93 was marked for identification.)

03:02:24 17 BY MS. HAYRAPETIAN:

03:02:24 18 Q This is yet another iMessage produced by

03:02:27 19 Milagro Cooper in this litigation between Tory and

03:02:29 20 herself, and it was sent sometime after the trial was

03:02:34 21 coming to an end -- or had come to an end.

03:02:36 22 And it says, "Yoooooow. It's Tory. Hit me."

03:02:38 23 Do you see that in front of you?

03:02:40 24 A I see a piece of paper that says, "Yoooooow.

03:02:42 25 It's Tory. Hit me." I see that on a piece of paper.

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03:02:46 1 Q Great. So I've now shown you documents  
03:02:49 2 from -- ranging from 2020 to 2022 with Tory and  
03:02:53 3 Ms. Cooper speaking directly; right?

03:02:56 4 A I don't know about what it is. I know it's on  
03:02:58 5 a piece of paper that you gave me.

03:03:00 6 Q And that's what I showed you; right?

03:03:01 7 A No. You showed me a piece of paper that said,  
03:03:03 8 "Yoooooow. It's Tory. Hit me." I don't know who it's  
03:03:06 9 to, who it's not to. I don't know any of that.

03:03:08 10 Q Well, okay. I just told you it was produced  
03:03:10 11 in this litigation by Ms. Cooper because it was a text  
03:03:12 12 message.

03:03:13 13 A Then you should be asking her and not me then.

03:03:15 14 Q So -- so this comes back to your statement  
03:03:18 15 actually that when -- when you said their communications  
03:03:25 16 were bullshit, you were wrong, weren't you? 'Cause you  
03:03:28 17 claim --

03:03:28 18 A I said whose communications?

03:03:30 19 MS. DIXON: Objection. Calls for speculation.

03:03:31 20 BY MS. HAYRAPETIAN:

03:03:32 21 Q You claimed, in Exhibit 90, that it was  
03:03:35 22 bullshit, the accusations in Ms. Cooper's complaint that  
03:03:39 23 Tory and Milagro were speaking together; right?

03:03:44 24 A I don't remember that.

03:03:46 25 Q Okay. Well, we just listened to it.

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03:03:47 1 We can play the tape back, if you want?

03:03:49 2 MS. DIXON: Objection. Mischaracterizes the

03:03:51 3 evidence.

03:03:51 4 THE WITNESS: You can play it all you want. I

03:03:53 5 still won't remember it.

03:03:54 6 BY MS. HAYRAPETIAN:

03:03:54 7 Q Okay. So Tory also said, "It would be funny,"

03:03:57 8 quote, right, "when Ms. Pete and her team," quote, "go

03:04:01 9 looking and they find nothing."

03:04:04 10 Is hiding evidence funny to you?

03:04:06 11 MR. HAYDEN: Objection. Speculation.

03:04:08 12 THE WITNESS: You said who said that?

03:04:08 13 BY MS. HAYRAPETIAN:

03:04:09 14 Q Tory said that. He said --

03:04:11 15 A So why are you asking me is it funny to me?

03:04:13 16 Say it again.

03:04:14 17 Q I'm just curious.

03:04:15 18 A I don't understand what you are saying.

03:04:16 19 How are you saying he said that isn't funny to

03:04:17 20 me? Trump said a bunch of stuff.

03:04:19 21 Is that funny to you? Are you saying that?

03:04:22 22 You got to -- you got to narrow it down. I

03:04:23 23 didn't say any of that.

03:04:26 24 Q So you listened to the conversation; correct?

03:04:28 25 A Which conversation?

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03:04:28 1 Q The one where we just heard Tory talking about  
03:04:31 2 how this situation was funny, and how when the lawyers,  
03:04:35 3 quote, "go looking and they find nothing."

03:04:37 4 A Oh. That's what he said?

03:04:39 5 Q Right. Yes.

03:04:40 6 A Why are you asking me?

03:04:41 7 Q We just listened together.

03:04:42 8 A Why are you asking me this?

03:04:43 9 Q Is it funny to you? Is hiding evidence --

03:04:44 10 A Is what funny to me?

03:04:45 11 Q Is hiding evidence funny to you?

03:04:47 12 A Is it funny to you?

03:04:48 13 Q I'm not at my deposition today.

03:04:49 14 A I'm not really not either but okay. I don't  
03:04:51 15 know what you are talking about.

03:04:53 16 Q Okay. Is intentionally destroying evidence  
03:04:57 17 funny?

03:04:58 18 MR. HAYDEN: Objection. Speculation.  
03:04:59 19 Mischaracterizes evidence -- or facts in evidence.

03:05:03 20 THE WITNESS: I don't know what you are  
03:05:04 21 talking about.

03:05:05 22 BY MS. HAYRAPETIAN:

03:05:05 23 Q Did Tory tell you he found it funny to refuse  
03:05:08 24 to cooperate during his deposition in this case?

03:05:12 25 A Whose deposition?

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03:05:13 1 MS. DIXON: Objection. Assumes facts not in  
03:05:14 2 evidence.  
03:05:15 3 BY MS. HAYRAPETIAN:  
03:05:16 4 Q Tory's deposition?  
03:05:17 5 A Did he say what?  
03:05:18 6 Q Did Tory tell you he found it funny to refuse  
03:05:20 7 to cooperate during his deposition in this case?  
03:05:24 8 A I don't remember him ever telling me anything.  
03:05:25 9 I think I was deaf until I met you.  
03:05:32 10 Q Did Tory tell you he thought he outsmarted  
03:05:36 11 Ms. Pete and her team by having third parties relay his  
03:05:39 12 messages to Ms. Cooper?  
03:05:41 13 MR. HAYDEN: Speculation. Assumes facts not  
03:05:42 14 in evidence.  
03:05:44 15 THE WITNESS: I don't remember nothing. I  
03:05:45 16 don't know what you are talking about.  
03:05:46 17 BY MS. HAYRAPETIAN:  
03:05:47 18 Q Okay.  
03:05:48 19 MS. HAYRAPETIAN: Okay. Let's mark as Exhibit  
03:05:49 20 Number 94, Tab 15-A, please. Can we get that ready to  
03:05:56 21 play. And that will be 93 -- sorry 94-A, and the  
03:06:01 22 transcript will be 94-B.  
03:06:32 23 (Exhibit 94 was marked for identification.)  
03:06:32 24 (Exhibit 94-B was marked for identification.)  
03:06:33 25 (A video clip was played.)

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03:06:34 1 MS. HAYRAPETIAN: I don't think we can hear  
03:06:35 2 again.  
03:06:35 3 (A video clip was played.)  
03:07:02 4 MS. HAYRAPETIAN: I'll just play it on my end  
03:07:03 5 if you can't get it up.  
03:07:05 6 THE WITNESS: You guys want any help? I can  
03:07:06 7 help you.  
03:07:08 8 MS. HAYRAPETIAN: No. It's okay.  
03:07:09 9 (A video clip was played.)  
03:07:20 10 BY MS. HAYRAPETIAN:  
03:07:21 11 Q Okay. So, on November 19, you spoke to Tory  
03:07:23 12 over the prison phone line, and you told Tory that you,  
03:07:26 13 quote, "Had to pay \$5,000 today to retain a firm in  
03:07:30 14 Florida today just so we can use -- have their shit just  
03:07:35 15 like pro hac."  
03:07:36 16 Do you remember that?  
03:07:37 17 A I didn't even hear that right now.  
03:07:40 18 MS. HAYRAPETIAN: Okay.  
03:07:40 19 Can we play it again, please?  
03:07:42 20 THE WITNESS: Let's listen.  
03:07:48 21 STENO TECH: Yes, ma'am, just a moment.  
03:07:49 22 (A video clip was played.)  
03:08:15 23 BY MS. HAYRAPETIAN:  
03:08:16 24 Q Okay. Did you hear you saying you had to pay  
03:08:18 25 \$5,000 to the Florida firm?



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03:08:21 1 A I heard that part. But where it says -- I  
03:08:23 2 think it cut off before it finished -- what you guys  
03:08:25 3 were saying it said.

03:08:28 4 Q Well, I think we all just listened. It  
03:08:32 5 said --

03:08:32 6 A You are just assuming it meant pro hac.

03:08:35 7 Q Well, what did it mean?

03:08:36 8 A I don't know, but I didn't hear it. For what  
03:08:38 9 you just played and what the paper says, it's two  
03:08:40 10 different things.

03:08:41 11 But -- so are we assuming it says  
03:08:43 12 pro-football? Baseball? Why are we assuming pro hac --  
03:08:47 13 I'm just saying?

03:08:49 14 Q Well, we heard pro hac.

03:08:50 15 A Did you? No you didn't. Play it again. And  
03:08:53 16 you guys can say whether you heard the word "hac"  
03:08:56 17 because I sure didn't.

03:08:58 18 MS. HAYRAPETIAN: Okay. Go ahead. Play it  
03:08:59 19 one more time.

03:09:00 20 STENO TECH: Okay. Just a moment.

03:09:17 21 THE WITNESS: They got a company that can help  
03:09:20 22 you -- with you guys, if you need help.

03:09:24 23 (A video clip was played.)

03:09:32 24 BY MS. HAYRAPETIAN:

03:09:33 25 Q Okay. So I hear pro hac.

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03:09:34 1 A Oh, did you?

03:09:35 2 Q If you hear something different, let me know.

03:09:37 3 A I did. I heard pro.

03:09:39 4 Q Pro. Okay.

03:09:40 5 And what were you talking about?

03:09:41 6 A I don't know. I don't remember.

03:09:42 7 Q Okay. So you were talking about hiring

03:09:47 8 local -- local counsel, Mr. Pancier, for Ms. Cooper's

03:09:52 9 case, correct, for \$5,000?

03:09:53 10 A I don't remember.

03:09:54 11 Q Okay. What other cases have you had in

03:09:58 12 Florida?

03:10:00 13 A I don't remember.

03:10:00 14 Q Who actually paid the \$5,000? Was it UTP or

03:10:07 15 Ms. Cooper?

03:10:08 16 A I don't remember.

03:10:08 17 Q Why are you updating Tory about expenses for

03:10:12 18 Ms. Cooper's case?

03:10:15 19 A I don't remember.

03:10:15 20 Q Tory's not Ms. Cooper's client. He is your

03:10:19 21 client; correct?

03:10:21 22 A I don't remember.

03:10:21 23 Q So why does Tory need to know about another

03:10:25 24 client's legal fees?

03:10:27 25 A Is that a question?

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03:10:28 1 Q Yeah?

03:10:29 2 A Oh. I don't remember.

03:10:30 3 Q You are updating Tory because he is the one

03:10:33 4 funding Ms. Cooper's defense, aren't you?

03:10:35 5 MR. HAYDEN: Objection. Speculation.

03:10:38 6 MS. DIXON: Objection. Also assumes facts not

03:10:40 7 in evidence.

03:10:42 8 BY MS. HAYRAPETIAN:

03:10:42 9 Q Answer.

03:10:43 10 A What was the question?

03:10:44 11 MS. HAYRAPETIAN: Can you read it back,

03:10:44 12 Ms. Court Reporter, please.

03:10:46 13 (The following record was read:

03:10:46 14 "QUESTION: You are updating Tory because

03:10:46 15 he is the one funding Ms. Cooper's

03:10:46 16 defense, aren't you?")

03:10:59 17 THE WITNESS: Oh. You are not going to say

03:11:00 18 that from her?

03:11:01 19 No.

03:11:04 20 BY MS. HAYRAPETIAN:

03:11:04 21 Q No? Oh, you remember the answer to this one?

03:11:07 22 A I think it was -- I think what she said I said

03:11:09 23 no to.

03:11:10 24 Q Okay. So you had an answer to this one?

03:11:14 25 A You want it again?

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03:11:15 1 Q I'm just checking. Yeah.

03:11:16 2 A No.

03:11:16 3 Q Okay. Your memory is back?

03:11:21 4 MS. DIXON: Objection. You are being

03:11:22 5 argumentative and badgering the witness.

03:11:24 6 THE WITNESS: Say it again. I couldn't hear

03:11:26 7 you.

03:11:26 8 BY MS. HAYRAPETIAN:

03:11:26 9 Q Your memory is back now?

03:11:27 10 A Oh, it was gone? Oh.

03:11:30 11 Q You've only said you couldn't remember maybe

03:11:32 12 100-something times today.

03:11:34 13 A Oh. Things I didn't remember; right?

03:11:36 14 Q Okay.

03:11:37 15 A You want me to lie. I can lie, if you want me

03:11:39 16 to.

03:11:39 17 What do you want me to lie about?

03:11:42 18 MS. HAYRAPETIAN: Let's mark as Exhibit 95,

03:11:44 19 Tab 44-A, if we can pull that up, and the transcript of

03:11:50 20 the same will be 95-B.

03:13:09 21 (Exhibit 95-A was marked for identification.)

03:13:09 22 (Exhibit 95-B was marked for identification.)

03:13:09 23 (A video clip was played.)

03:16:47 24 BY MS. HAYRAPETIAN:

03:16:48 25 Q Okay. During this call you told -- you told

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03:16:53 1 Tory, quote, "Yeah. I can't tell you because Mitch told  
03:16:56 2 me not to because you are our client. Listen, I'm going  
03:17:00 3 to tell you some shit, but you got to swear to God you  
03:17:02 4 can't even tell Ray now."

03:17:06 5 You then proceeded to tell Tory information  
03:17:08 6 that you know you should not tell him as your client.  
03:17:11 7 You told Tory that a UTP attorney used to be a porn star  
03:17:16 8 named Vivian West, and that she filmed videos of  
03:17:22 9 transvestites gangbangng her. You proceeded to tell  
03:17:28 10 Tory this, noting that the UTP lawyer could sue you for  
03:17:32 11 telling a client information like this.

03:17:34 12 I just heard that correctly; right?

03:17:37 13 A I don't know.

03:17:37 14 MR. HAYDEN: Objection. Compound. Narrative.  
03:17:39 15 Relevance.

03:17:43 16 BY MS. HAYRAPETIAN:

03:17:43 17 Q So you are laughing and having a lot of fun  
03:17:47 18 during that recording.

03:17:49 19 A So were you.

03:17:50 20 Q I was not, actually.

03:17:51 21 A You were.

03:17:52 22 Q Okay.

03:17:53 23 A Okay.

03:17:54 24 Q Why did you find it funny?

03:17:56 25 A Why did you find it funny?

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03:17:59 1 Q I'm not laughing.

03:18:00 2 A Oh, you were a minute ago. I don't recall. I

03:18:03 3 don't remember.

03:18:04 4 Q You don't remember why you found it funny?

03:18:06 5 A Huh-uh.

03:18:07 6 Q Okay. So you were sharing information, you

03:18:10 7 shouldn't. And you weren't being discreet here; right?

03:18:14 8 MR. HAYDEN: Objection. Speculation.

03:18:17 9 MS. DIXON: Objection. Relevance to this

03:18:19 10 case.

03:18:19 11 BY MS. HAYRAPETIAN:

03:18:20 12 Q Right?

03:18:21 13 A I don't recall.

03:18:22 14 Q On this call, you told Tory confidential

03:18:24 15 information that you knew you shouldn't share; correct?

03:18:28 16 MR. HAYDEN: Objection. Speculation.

03:18:29 17 Relevance.

03:18:30 18 THE WITNESS: I don't recall.

03:18:30 19 BY MS. HAYRAPETIAN:

03:18:31 20 Q By sharing secrets with Tory, you were showing

03:18:33 21 him that --

03:18:34 22 A What were his secrets? How do -- how do you

03:18:36 23 know that's a secret? How do you know that's not public

03:18:38 24 information? How do you know you can't look it up right

03:18:40 25 now? So how is it a secret?

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03:18:42 1 Q Well, because you said --

03:18:43 2 A I don't recall.

03:18:44 3 Q Because you said, quote --

03:18:45 4 A What I said don't mean nothing. You just said

03:18:47 5 what I said don't meaning nothing. I don't recall.

03:18:49 6 Q So I'm speaking.

03:18:51 7 A Okay. I just was.

03:18:53 8 Q Sir.

03:18:53 9 A Ma'am.

03:18:54 10 Q You said, "Yeah. I can't tell you because

03:18:56 11 Mitch told me not to because you are our client." So --

03:19:01 12 A Okay.

03:19:01 13 Q -- you said something that you were not

03:19:03 14 supposed to share?

03:19:05 15 A That don't make it the law because that's what

03:19:07 16 I said.

03:19:08 17 MR. HAYDEN: Objection. Speculation.

03:19:08 18 Relevance.

03:19:09 19 BY MS. HAYRAPETIAN:

03:19:10 20 Q I'm not talking about the law.

03:19:11 21 MS. DIXON: Objection. That's also a

03:19:12 22 misstatement of the law.

03:19:13 23 BY MS. HAYRAPETIAN:

03:19:13 24 Q And you were showing him that you are willing

03:19:15 25 to share secrets, weren't you?

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03:19:16 1 MR. HAYDEN: Objection. Speculation.

03:19:18 2 THE WITNESS: I don't remember nothing.

03:19:18 3 BY MS. HAYRAPETIAN:

03:19:20 4 Q Tory learned he could trust you to pass along

03:19:22 5 information; correct?

03:19:24 6 MR. HAYDEN: Objection. Speculation.

03:19:29 7 THE WITNESS: Was that a question?

03:19:30 8 BY MS. HAYRAPETIAN:

03:19:30 9 Q Uh-huh.

03:19:30 10 A Oh. He said what?

03:19:34 11 Q Tory learned he could trust you to pass along

03:19:37 12 confidential information; correct?

03:19:41 13 A I don't know what you are talking about.

03:19:43 14 Q When Tory gives you information about

03:19:46 15 Ms. Pete, he knows you will share that too?

03:19:49 16 A Who?

03:19:49 17 MR. HAYDEN: Objection. Speculation.

03:19:51 18 THE WITNESS: Who's Ms. Pete?

03:19:51 19 BY MS. HAYRAPETIAN:

03:19:52 20 Q We've been talking about Ms. Pete.

03:19:54 21 A Oh. The same person we've been talking about

03:19:56 22 all day. Oh, I don't remember.

03:19:59 23 Q And that's exactly what Tory wanted, right,

03:20:03 24 someone who would share his secrets with Ms. Cooper?

03:20:07 25 MR. HAYDEN: Objection. Speculation.



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03:20:09 1 THE WITNESS: I don't know nothing.

03:20:10 2 BY MS. HAYRAPETIAN:

03:20:10 3 Q By this exchange about your colleague,

03:20:18 4 divulging really private information, you proved to Tory

03:20:21 5 that you are the kind of person who shares information

03:20:24 6 you are supposed to keep confidential, didn't you?

03:20:27 7 MR. HAYDEN: Objection. Speculation. Calls

03:20:28 8 for a legal conclusion.

03:20:30 9 THE WITNESS: And what is considered private

03:20:31 10 information? What are you talking about? Anything that

03:20:34 11 was shared that you just read was public information; so

03:20:36 12 I don't know. I don't remember what you are talking

03:20:38 13 about. I don't know nothing.

03:20:39 14 BY MS. HAYRAPETIAN:

03:20:40 15 Q Well, I am talking about your own words.

03:20:41 16 Quote, "Yeah. I can't tell you because Mitch told me

03:20:44 17 not to because you are our client."

03:20:45 18 A That don't make it the law. That don't make

03:20:48 19 it right.

03:20:48 20 Q I'm not talking about the law.

03:20:50 21 A Okay. That's what you just said is that

03:20:51 22 I'm -- divulging something that's private. I ain't

03:20:55 23 divulging nothing that's private. That was made public

03:20:56 24 to me.

03:20:56 25 But to answer you're question, I don't

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03:21:00 1 remember.

03:21:00 2 BY MS. HAYRAPETIAN:

03:21:00 3 Q It doesn't matter what the information was

03:21:02 4 because you told Tory you were not supposed to tell him,

03:21:05 5 and then you told him; right?

03:21:07 6 MR. HAYDEN: Objection. Relevance.

03:21:09 7 THE WITNESS: I don't remember. I don't

03:21:09 8 remember.

03:21:10 9 BY MS. HAYRAPETIAN:

03:21:10 10 Q Luckily you don't have to remember because I

03:21:12 11 just played back your own voice.

03:21:14 12 A Did you?

03:21:14 13 Q Right.

03:21:15 14 A Oh.

03:21:20 15 Q So you agree with me that --

03:21:22 16 A I don't agree with you on nothing at all.

03:21:23 17 Q -- you proved to Tory you are the kind of

03:21:25 18 person who shares information you are supposed to keep

03:21:28 19 private; correct?

03:21:30 20 MR. HAYDEN: Objection. Speculation.

03:21:31 21 THE WITNESS: I don't know what you are

03:21:31 22 talking about.

03:21:32 23 BY MS. HAYRAPETIAN:

03:21:32 24 Q Okay.

03:21:34 25 A I ain't agreeing with you on nothing since

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03:21:36 1 we've been here.

03:21:38 2 Q On November 1, 2024, you and Ms. Cooper dialed  
03:21:42 3 each other three times, and you spoke to her for almost  
03:21:46 4 22 minutes, and that's reflected in the prior exhibit --  
03:21:49 5 the AT&T document, Exhibit 87. And earlier that day you  
03:21:59 6 were texting with Ms. Cooper and your employee  
03:22:03 7 Ms. Jazmyne Jamison.

03:22:07 8 MS. HAYRAPETIAN: I'll mark for the record as  
03:22:08 9 Exhibit 96, as Tab 48.

03:22:32 10 (Exhibit 96 was marked for identification.)

03:22:33 11 BY MS. HAYRAPETIAN:

03:22:33 12 Q So this is a group chat between Jazmyne,  
03:22:36 13 yourself, and Ms. Cooper. And in this group chat you  
03:22:39 14 texted Ms. Cooper, "Milagro, I need to talk to this guy.  
03:22:43 15 I need Akademik's number. What he is saying makes all  
03:22:48 16 the sense in the world, and he is getting your back. I  
03:22:52 17 want to talk to this guy. You set that up. Please,  
03:22:56 18 tell him the CEO of Unite the People wants to talk to  
03:22:59 19 him."

03:23:04 20 You were referring to DJ Akademiks; correct?

03:23:07 21 A I don't remember.

03:23:08 22 Q You were referring to Tory's friend and  
03:23:11 23 blogger Livingston Allen also known as DJ Akademiks;  
03:23:16 24 correct?

03:23:17 25 A I don't remember.

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03:23:17 1 Q Is there any other Akademiks you know whose  
03:23:24 2 number you would be asking for?  
03:23:25 3 A I don't remember.  
03:23:26 4 Q What did you mean when you texted that "what  
03:23:30 5 he is saying makes all the sense in the world"?  
03:23:33 6 A I do not remember.  
03:23:34 7 Q What was DJ Akademiks saying that made all the  
03:23:37 8 sense in the world?  
03:23:39 9 A I do not remember.  
03:23:40 10 Q What did you mean when you texted Ms. Cooper  
03:23:42 11 that "he is getting your back"?  
03:23:45 12 A I do not remember.  
03:23:46 13 Q How was DJ Akademiks getting Ms. Cooper's  
03:23:49 14 back?  
03:23:50 15 A I don't remember.  
03:23:51 16 Q Is Tory paying Cooper through DJ Akademiks?  
03:23:54 17 A I don't know who -- remember nothing or know  
03:23:57 18 what you are talking about.  
03:23:58 19 Q Why did you need Ms. Cooper to set up a phone  
03:24:00 20 call with DJ Akademiks?  
03:24:02 21 A I don't remember.  
03:24:03 22 Q Did you end up having a conversation with  
03:24:04 23 DJ Akademiks?  
03:24:06 24 A I don't remember.  
03:24:08 25 Q What did you discuss with DJ Akademiks?

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03:24:12 1 A I don't remember.

03:24:14 2 MR. HAYDEN: Objection. Asked and answered.

03:24:15 3 BY MS. HAYRAPETIAN:

03:24:15 4 Q Was Tory present when you spoke to

03:24:18 5 DJ Akademiks?

03:24:21 6 MR. HAYDEN: Objection. Speculation.

03:24:23 7 THE WITNESS: I don't think Tory can be

03:24:24 8 present anywhere from prison; right?

03:24:26 9 BY MS. HAYRAPETIAN:

03:24:27 10 Q Well, could be present on a three-way call.

03:24:29 11 A Oh. Is that present? Is it?

03:24:32 12 Q It is.

03:24:32 13 A Oh, I didn't know. I don't know. I don't

03:24:34 14 remember ever talking to anybody.

03:24:37 15 Q What do you know of Ms. Cooper's relationship

03:24:39 16 with DJ Akademiks?

03:24:41 17 A I don't know nothing.

03:24:44 18 Q Did Tory tell you to talk to Ms. Cooper to get

03:24:46 19 connected to DJ Akademiks?

03:24:49 20 A I don't know nothing.

03:24:53 21 Q On November 7, Ms. Cooper's phone log shows

03:24:56 22 seven attempted calls between your phone and hers, and

03:24:59 23 that's on the AT&T, Exhibit 87. And on November 7, you

03:25:05 24 also texted Ms. Cooper, "Can you call me? It's

03:25:09 25 important. Thank you."

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03:25:12 1 MS. HAYRAPETIAN: And I'm going to mark as  
03:25:13 2 Exhibit 97 -- the first text message is what I'm  
03:25:18 3 referring to.

03:25:33 4 (Exhibit 97 was marked for identification.)

03:25:33 5 BY MS. HAYRAPETIAN:

03:25:33 6 Q So what was so important that she needed to  
03:25:41 7 call you urgently?

03:25:43 8 A I don't remember.

03:25:43 9 Q Why were you so desperate to reach her on  
03:25:47 10 November 7?

03:25:50 11 A I don't see it saying anything about somebody  
03:25:52 12 being desperate, but if you mean the same thing you just  
03:25:54 13 read that don't say nothing about desperate, where it  
03:25:57 14 says, "Can you call me, it's important," I don't  
03:26:00 15 remember.

03:26:05 16 Q You were passing on messages between Tory and  
03:26:08 17 Ms. Cooper; right?

03:26:09 18 A Never ever.

03:26:10 19 Q That -- that answer, you remember?

03:26:13 20 A Did I answer it?

03:26:16 21 Q You -- you said your memory is back; right?

03:26:18 22 A Did I answer it?

03:26:19 23 Q Yeah, you did.

03:26:20 24 A Okay. What did I say?

03:26:21 25 Q My follow-up question is --

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03:26:22 1 A What did I say? Never.

03:26:24 2 Q -- is your memory is back?

03:26:25 3 A So then it is never ever.

03:26:25 4 Q So your memory is back? I'm just checking.

03:26:27 5 A Are you saying my memory is gone?

03:26:29 6 Q You -- you are the one who said you didn't

03:26:30 7 remember for 90 percent -- 98 percent of my questions

03:26:33 8 today. Actually, 99.9.

03:26:35 9 A So you should have picked a different set of

03:26:37 10 questions, because for 98 percent of your questions that

03:26:39 11 you picked, I don't remember.

03:26:41 12 Q Why? 'Cause you don't like my questions.

03:26:44 13 A Because I don't remember.

03:26:46 14 You want me to fake now. If you are telling

03:26:48 15 me to fake here on camera -- tell me to lie on camera --

03:26:50 16 but as of right now, I don't remember nothing.

03:26:53 17 Q It's just that your memory seems very

03:26:55 18 convenient because you just said you never ever did

03:26:58 19 something. So that one, you remembered; right?

03:27:01 20 A Did I say that? If I said that, then that's

03:27:05 21 what I said.

03:27:07 22 You can't make me -- unless you are trying to

03:27:09 23 put words in my mouth, tell me. Tell me what you want

03:27:11 24 me to say. Because if I don't remember, all I can say

03:27:14 25 is "I don't remember."

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03:27:15 1 Q On December 12th, 2024, you and Ms. Cooper  
03:27:19 2 attempted to reach each other six times. One of your  
03:27:23 3 cases you spoke for over six minutes. You also texted  
03:27:29 4 Ms. Cooper on December 12.

03:27:32 5 MS. HAYRAPETIAN: And I'm adding as  
03:27:33 6 Exhibit 97 -- sorry -- 98.

03:27:54 7 STENO TECH: Counsel, can we get the Exhibit  
03:27:55 8 Number for 98?

03:27:57 9 MS. HAYRAPETIAN: Tab 54.

03:27:57 10 STENO TECH: Thank you.

03:27:57 11 (Exhibit 98 was marked for identification.)

03:27:58 12 BY MS. HAYRAPETIAN:

03:27:58 13 Q You texted, "Hey, when you get a chance, if  
03:28:00 14 you could give me a call, that would be great, as soon  
03:28:02 15 as possible."

03:28:03 16 What was urgent that you needed to discuss  
03:28:07 17 with her?

03:28:08 18 A I'm reading what is right here. I don't see  
03:28:10 19 anything saying that it was urgent. I think that's  
03:28:12 20 something that you are just making up.

03:28:15 21 But from right here, I don't remember whatever  
03:28:17 22 it was about.

03:28:19 23 Q Okay. So do you see the last four words that  
03:28:21 24 say, "as soon as possible"?

03:28:23 25 A I don't see urgent. I see as soon as



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03:28:25 1 possible, but I don't see urgent.

03:28:26 2 Q Okay. And what do the word -- do the words  
03:28:29 3 "as soon as possible" indicate a sense of urgency to  
03:28:31 4 you?

03:28:32 5 A No. It indicates as soon as possible.

03:28:35 6 Q And what does that mean?

03:28:37 7 A As soon as you possibly can.

03:28:38 8 Q But can you say that in different words?

03:28:41 9 A As soon as possible? I can say that in  
03:28:44 10 Swahili.

03:28:45 11 Q You didn't say no rush; right?

03:28:47 12 A Oh. I didn't say no rush.

03:28:48 13 Q Right.

03:28:49 14 A No. I just said as soon as possible.

03:28:50 15 Q So you said the opposite of no rush, as in  
03:28:51 16 it's important?

03:28:52 17 A What is the opposite of no rush?

03:28:54 18 Q You tell me.

03:28:55 19 A I don't know. You the one that know all the  
03:28:56 20 words. I don't remember; remember?

03:29:02 21 Q The following day, December 13, 2024, right  
03:29:06 22 after your urgent -- or as soon as possible text  
03:29:09 23 message, Ms. Cooper posted on social media.

03:29:14 24 A She didn't post the day before?

03:29:18 25 MS. HAYRAPETIAN: Marking as Tab 17,

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03:29:21 1 Exhibit 99.

03:29:39 2 (Exhibit 99 was marked for identification.)

03:29:39 3 BY MS. HAYRAPETIAN:

03:29:39 4 Q Ms. Cooper posted about your interview with

03:29:41 5 "TMZ," quoting from a direct lead, quote, "Tory Lanez,

03:29:45 6 his father Sonstar Peterson, and blogger Milagro Gramz

03:29:48 7 are firing back at claims from Megan Thee Stallion's

03:29:51 8 lawyers that they're conspiring to spread misinformation

03:29:54 9 and harass the Roc Nation rapper in a complaint filed

03:29:57 10 this week. These allegations largely stem from

03:30:00 11 jailhouse phone calls between Tory, Sonstar, and

03:30:04 12 Milagro, real name Milagro Cooper, but Ceasar McDowell

03:30:07 13 CEO of Unite the People says his client is a victim of a

03:30:10 14 calculated legal takedown."

03:30:18 15 So that's just a few hours from your "call me

03:30:21 16 as soon as possible" text. That's what you were

03:30:25 17 discussing; right?

03:30:27 18 MR. HAYDEN: Objection. Compound. Narrative.

03:30:29 19 THE WITNESS: That's -- I didn't see you said

03:30:31 20 I discussed anything. I thought you said I text

03:30:34 21 something.

03:30:34 22 Where does it say I discussed something?

03:30:38 23 BY MS. HAYRAPETIAN:

03:30:38 24 Q I'm asking you.

03:30:39 25 A I'm asking you. I don't see what you are

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03:30:41 1 saying.

03:30:42 2 Q Your "TMZ" article is what you wanted to  
03:30:44 3 discuss with Ms. Cooper as soon as possible; correct?

03:30:47 4 A I don't remember.

03:30:51 5 Q So the day after your "as soon as possible"  
03:30:54 6 text to Ms. Cooper, she posts your "TMZ" article about  
03:31:00 7 Tory Lanez and Megan Pete; correct?

03:31:02 8 A I don't know. You said it, not me.

03:31:06 9 Q You did a "TMZ" interview about this case;  
03:31:08 10 correct?

03:31:13 11 A Probably.

03:31:13 12 Q You spoke to Tory before that interview;  
03:31:15 13 right?

03:31:15 14 A I don't remember ever speaking to him.

03:31:18 15 Q You spoke to Ms. Cooper before the interview;  
03:31:19 16 right?

03:31:21 17 A I don't remember speaking to her.

03:31:23 18 Q You were coordinating your public message with  
03:31:26 19 both of them, weren't you?

03:31:28 20 MR. HAYDEN: Objection. Speculation.

03:31:33 21 THE WITNESS: I never coordinated nothing with  
03:31:35 22 nobody. I don't know what you are talking about.

03:31:37 23 BY MS. HAYRAPETIAN:

03:31:37 24 Q You wanted everyone telling the same story and  
03:31:40 25 promoting the same message; correct?

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03:31:42 1 MR. HAYDEN: Objection. Speculation.  
03:31:42 2 Argumentative.  
03:31:43 3 THE WITNESS: You are saying I wanted.  
03:31:44 4 What did I want? Why would I want something?  
03:31:47 5 BY MS. HAYRAPETIAN:  
03:31:48 6 Q Is that your answer?  
03:31:50 7 A Yeah, that's my answer.  
03:31:55 8 Q Okay.  
03:32:00 9 MS. HAYRAPETIAN: So marking as Exhibit 100,  
03:32:01 10 Tab 18.  
03:32:05 11 MS. DIXON: I just had 92.  
03:32:12 12 THE WITNESS: We have to take a break in a  
03:32:13 13 minute. I'm going to have to get some more Tylenol.  
03:32:15 14 What time did I take that Tylenol at? What  
03:32:18 15 time was the lunch break? Was it lunch break when I  
03:32:21 16 took the Tylenol? It was before the lunch break?  
03:32:23 17 MR. HAYDEN: We're still on the record, guys.  
03:32:24 18 We'll get to it.  
03:32:25 19 THE WITNESS: I'm not giving none of that. My  
03:32:27 20 head is throbbing over here. I need medicine.  
03:32:29 21 MS. HAYRAPETIAN: Do you need a break right  
03:32:30 22 now?  
03:32:31 23 THE WITNESS: Yes.  
03:32:32 24 MS. HAYRAPETIAN: Okay. Let's go off the  
03:32:33 25 record, and let's take ten.

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03:32:34 1 THE VIDEOGRAPHER: The time is 3:32 PM  
03:32:36 2 Pacific time. We are now off the record.  
03:32:41 3 (Recess was taken.)  
03:46:10 4 THE VIDEOGRAPHER: The time is 4:01  
04:01:33 5 Pacific time. We are back on the record.  
04:01:37 6 MS. DIXON: I don't think I got 100.  
04:01:38 7 MS. HAYRAPETIAN: We haven't passed it out  
04:01:40 8 yet.  
04:01:41 9 MS. DIXON: Okay.  
04:01:41 10 MS. HAYRAPETIAN: So let me play you a clip  
04:01:42 11 from a phone conversation you had with Tory on  
04:01:46 12 November 1st.  
04:01:47 13 And, for the audio, it's Tab 59-A. And then  
04:01:54 14 we will be marking everything as Exhibit 100. The  
04:01:59 15 transcript will be 100-B. Video will be 100-A.  
04:02:05 16 (Exhibit 100-A was marked for identification.)  
04:02:05 17 (Exhibit 100-B was marked for identification.)  
04:02:44 18 STENO TECH: I'm going to start the clip in  
04:02:44 19 just a second. Just let me know if everyone can hear  
04:02:47 20 it.  
04:02:48 21 (A video clip was played.)  
04:02:51 22 MS. HAYRAPETIAN: That was good. If we can  
04:02:52 23 raise the volume, that would be better.  
04:02:55 24 STENO TECH: Of course.  
04:02:56 25 MS. HAYRAPETIAN: Perfect. Thank you.

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04:02:57 1 STENO TECH: Would you like to start the clip?

04:02:59 2 MS. HAYRAPETIAN: Yes, please.

04:03:24 3 (A video clip was played.)

04:04:38 4 BY MS. HAYRAPETIAN:

04:04:39 5 Q Okay. So what did you understand Tory to mean

04:04:44 6 when he asked if the two of you should do another

04:04:48 7 bailout?

04:04:49 8 A I do not know.

04:04:50 9 Q Have you heard the word "bailout"?

04:04:58 10 A I don't know.

04:04:59 11 Q So how come he is saying "another bailout,"

04:05:02 12 indicating that there was a prior bailout?

04:05:05 13 A I remember they bailed out the banks. That

04:05:08 14 might be what's happening. I don't know.

04:05:10 15 Q Who bailed out the banks?

04:05:12 16 A I think the Government bailed out the banks.

04:05:14 17 Q Okay. So how -- why would Tory be saying,

04:05:17 18 "You don't think we should do another bailout"?

04:05:21 19 A Probably talking politics. I do not know. I

04:05:25 20 don't remember.

04:05:26 21 Q Okay. Why -- do you and Tory frequently talk

04:05:31 22 about politics?

04:05:31 23 A I don't remember everything we talked about.

04:05:33 24 Q Okay. But you think he is talking to you

04:05:35 25 about politics; right?

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04:05:37 1 A I don't know.

04:05:40 2 Q Do you identify with the Democratic or

04:05:42 3 Republican party?

04:05:43 4 MR. HAYDEN: Objection. Relevance.

04:05:48 5 THE WITNESS: I don't know.

04:05:48 6 BY MS. HAYRAPETIAN:

04:05:48 7 Q You don't know? You don't have a preferred

04:05:50 8 party?

04:05:54 9 A The "House Party" is good sometimes.

04:06:04 10 Q Is Tory saying you and UTP have bailed out

04:06:08 11 others in the past by bailout?

04:06:11 12 A I don't know.

04:06:12 13 Q Tory funded this campaign run under UTP's name

04:06:17 14 to improve his public image; right?

04:06:19 15 MR. HAYDEN: Objection. Speculation.

04:06:22 16 THE WITNESS: I don't know.

04:06:22 17 BY MS. HAYRAPETIAN:

04:06:22 18 Q What did you understand Tory to mean when he

04:06:26 19 said, quote, "like get some cheap ones and the way you

04:06:31 20 can still give money to the firm."

04:06:34 21 A I do not know.

04:06:35 22 Q Tory is saying that he could pay for cheaper

04:06:39 23 bails of UTP clients; right?

04:06:41 24 A I don't know.

04:06:43 25 Q And you understood Tory to also mean that UTP

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04:06:45 1 could take a portion of his money too; right?

04:06:48 2 MR. HAYDEN: Objection. Speculation.

04:06:50 3 THE WITNESS: I don't know.

04:06:50 4 BY MS. HAYRAPETIAN:

04:06:51 5 Q So UTP could use Tory's money for his own

04:06:53 6 purposes; right?

04:06:54 7 MR. HAYDEN: Objection. Speculation.

04:06:56 8 THE WITNESS: I don't know what you are

04:06:56 9 talking about.

04:06:57 10 BY MS. HAYRAPETIAN:

04:06:58 11 Q And you acknowledge that paying for people's

04:06:59 12 bails might be another good look; right?

04:07:04 13 A Paying for people's bails? Unite the People

04:07:07 14 don't pay for nobody's bails.

04:07:09 15 Q Quote, "might be another good look."

04:07:11 16 What were you talking about there?

04:07:13 17 A I don't remember, but I know Unite the People

04:07:15 18 don't bail nobody.

04:07:17 19 Bail bonds offices do bails, not law firms.

04:07:19 20 You guys do bails?

04:07:21 21 Q And you guys pay the bail bond officers?

04:07:24 22 A What bail bonds? Unite the People don't do no

04:07:26 23 bail bonds.

04:07:28 24 Q So what is the bailout you and Tory are

04:07:30 25 talking about here?



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04:07:31 1 A I don't remember.

04:07:34 2 Q You are advising Tory as to his public

04:07:37 3 relations and image, right, in this conversation?

04:07:39 4 MR. HAYDEN: Objection. Speculation.

04:07:41 5 THE WITNESS: I don't remember.

04:07:44 6 BY MS. HAYRAPETIAN:

04:07:45 7 Q And you claim that you should, quote, "make it

04:07:46 8 bigger this time" with Tory donating \$100,000?

04:07:53 9 A I don't know.

04:07:54 10 Q So let's -- let's read back your words that we

04:07:57 11 just heard. "Yeah, could do that. But I tell you what

04:08:00 12 we do. We make it bigger this time. Tory Lanez donated

04:08:05 13 100,000, and he still 30. You know what I mean?"

04:08:09 14 What did you mean?

04:08:11 15 A I don't remember.

04:08:12 16 Q So Tory was planning to donate \$100,000 to

04:08:22 17 UTP; correct?

04:08:23 18 MR. HAYDEN: Objection. Speculation.

04:08:27 19 THE WITNESS: I don't remember.

04:08:28 20 BY MS. HAYRAPETIAN:

04:08:28 21 Q Correct?

04:08:29 22 A I don't remember.

04:08:29 23 Q Did Tory donate \$100,000 to UTP?

04:08:36 24 A I don't remember what he donated.

04:08:38 25 Q Then you tell Tory, "Oh, damn it, but, uh,

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04:08:43 1 yeah. We could do some shit. Like I really want to  
04:08:47 2 holler at you about this Milagro shit and my ideas and  
04:08:51 3 see what you think 'cause I got to get to onto the --  
04:08:57 4 indiscernible."

04:08:58 5 What were you talking about?

04:09:00 6 A It was indiscernible to me too. I don't know.

04:09:06 7 Q Well, only one word was indiscernible. The  
04:09:09 8 rest are fine; so --

04:09:10 9 A Oh. Was it? I don't know.

04:09:11 10 Q What were you talking about? What ideas did  
04:09:13 11 you have regarding Milagro's shit?

04:09:16 12 MS. DIXON: Objection. Calls for a legal  
04:09:17 13 strategy. Calls for a attorney-client privilege and  
04:09:21 14 work product.

04:09:24 15 THE WITNESS: I don't know.

04:09:29 16 BY MS. HAYRAPETIAN:

04:09:29 17 Q What -- what ideas did you have about  
04:09:31 18 Milagro's case?

04:09:32 19 MR. HAYDEN: Objection. Asked and answered.

04:09:36 20 THE WITNESS: I don't know.

04:09:36 21 BY MS. HAYRAPETIAN:

04:09:36 22 Q You don't know, or you don't remember?

04:09:42 23 A I don't know if I remember.

04:09:46 24 Q That's a good -- that's a new one?

04:09:47 25 A Is it?

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04:09:48 1 Q Yeah. That's a new one.

04:09:51 2 You're telling Tory about your interactions

04:09:55 3 with Ms. Cooper; right?

04:09:58 4 A I don't remember.

04:10:00 5 Q Why are you reporting back to Tory if it's not

04:10:02 6 to tell your favorite client about another client --

04:10:07 7 MR. HAYDEN: Objection. Speculation.

04:10:09 8 BY MS. HAYRAPETIAN:

04:10:09 9 Q -- whose litigation he's sponsoring and

04:10:10 10 funding?

04:10:13 11 MR. HAYDEN: Objection. Speculation.

04:10:15 12 THE WITNESS: I don't remember.

04:10:16 13 I could have swore I said my favorite client

04:10:18 14 was Allan McIntosh, but I'm sure you guys already have

04:10:21 15 it.

04:10:21 16 BY MS. HAYRAPETIAN:

04:10:23 17 Q No. You said that was the most high-profile

04:10:25 18 client.

04:10:26 19 A No.

04:10:26 20 Q You -- you actually have never told me who

04:10:27 21 your favorite client is?

04:10:29 22 A Then why did you just say he was my favorite?

04:10:31 23 You are making it up?

04:10:32 24 Q I'm assuming.

04:10:33 25 A Oh, you shouldn't assume. It makes --

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04:10:35 1 Q I mean tell me who is your favorite client?  
04:10:38 2 MR. HAYDEN: Objection. Asked and answered.  
04:10:39 3 THE WITNESS: I don't remember.  
04:10:40 4 BY MS. HAYRAPETIAN:  
04:10:41 5 Q You don't remember?  
04:10:43 6 A Huh-uh.  
04:10:43 7 Q So it is Tory?  
04:10:44 8 MR. HAYDEN: Objection. Speculation.  
04:10:45 9 Assuming facts not in evidence.  
04:10:47 10 BY MS. HAYRAPETIAN:  
04:10:47 11 Q I mean, you only talked to him at least twice  
04:10:49 12 a week.  
04:10:50 13 A Who?  
04:10:50 14 MR. HAYDEN: Objection. Argumentative.  
04:10:51 15 BY MS. HAYRAPETIAN:  
04:10:52 16 Q Tory. On a recorded line.  
04:10:53 17 A I don't remember.  
04:10:54 18 Q How often do you talk to Tory not on a  
04:10:56 19 recorded line?  
04:10:57 20 A Tory who?  
04:10:59 21 Q Tory Lanez, Daystar Peterson.  
04:11:01 22 A Oh, that rapper guy.  
04:11:02 23 Q Yep.  
04:11:03 24 A I think he is a singer. He can sing.  
04:11:07 25 I don't know. I don't remember talking to

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04:11:08 1 him. I told you I was deaf until I met you.

04:11:14 2 Q Okay. You've been coordinating with both Tory  
04:11:20 3 and Ms. Cooper, asking them for their thoughts or new  
04:11:23 4 ideas to improve Tory's public image and get him out of  
04:11:26 5 prison; right?

04:11:27 6 MR. HAYDEN: Objection. Speculation.

04:11:29 7 THE WITNESS: I don't even know what you just  
04:11:30 8 said. I was talking to who about what?

04:11:33 9 BY MS. HAYRAPETIAN:

04:11:34 10 Q You've been coordinating with both Tory and  
04:11:36 11 Ms. Cooper regarding Ms. Cooper's case; correct?

04:11:41 12 A I don't know what you are talking about.

04:11:44 13 Q Okay. UTP issued a press release about Tory's  
04:11:54 14 deposition in this litigation.

04:11:58 15 MS. HAYRAPETIAN: And I'm marking as  
04:11:59 16 Exhibit 101.

04:12:27 17 (Exhibit 100 was marked for identification.)

04:12:28 18 BY MS. HAYRAPETIAN:

04:12:28 19 Q I just handed you that paper.

04:12:30 20 A Thank you. I appreciate it.

04:12:32 21 Q Okay. So this exhibit is an Instagram post,  
04:12:39 22 and it's a joint posting of yours, Ceasar McDowell,  
04:12:44 23 Instagram account and Unite the People Instagram  
04:12:46 24 account, which as you know, running dual accounts, you  
04:12:50 25 have to approve through both accounts to get it posted

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04:12:53 1 on two separate accounts --

04:12:55 2 A Do you?

04:12:55 3 Q -- that's one post. Yes.

04:12:56 4 A I didn't know.

04:12:57 5 Q Okay. So -- so this joint posting includes a

04:13:04 6 screenshot of a press release which is titled, "Unite

04:13:10 7 the People Inc. CEO Ceasar McDowell Sets The Record

04:13:14 8 Straight On The Deposition, In RE Tory Lanez."

04:13:18 9 [As read] Lately, I haven't been responding to

04:13:21 10 all the rhetoric in the media. And then you go on,

04:13:25 11 Megan Thee Stallion's lawyers continue to try to and

04:13:29 12 give the appearance their case against Milagro Cooper is

04:13:32 13 successfully progressing by giving their, quote,

04:13:35 14 supposed mouthpiece Meghann Cuniff and all other persons

04:13:39 15 media or non-media wrong information.

04:13:42 16 And then you go on to explain that Tory Lanez

04:13:44 17 is not a party to Megan Thee Stallion's lawsuit against

04:13:47 18 UTP client Milagro Cooper, and, therefore, you UTP is

04:13:50 19 not obligated to produce Tory Lanez for a deposition,

04:13:53 20 nor did UTP agree or disagree to the deposition of

04:13:57 21 Mr. Lanez or any other potential witness. By law,

04:14:01 22 Megan's lawyers can depose any person they believe

04:14:04 23 possesses useful information to their case. To imply

04:14:07 24 UTP is going along with Megan's wishes or somehow is

04:14:11 25 being manipulated into going along is simply wrong, as

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04:14:14 1 everything else Ms. Cuniff and others have said.  
04:14:17 2 Despite her efforts to show she's the most useful of  
04:14:20 3 ignorant tools to Megan's counsel, she is repeatedly  
04:14:24 4 wrong about what is really happening in this case.

04:14:26 5 Lastly, if you know Tory Lanez how I do, good  
04:14:30 6 luck trying to get him to testify to anything. It's  
04:14:34 7 just not what he does, and he definitely did not agree  
04:14:37 8 to testify now. Ceasar McDowell, CEO, Unite the People  
04:14:42 9 Inc.

04:14:45 10 Do you recall that?

04:14:47 11 A I see it on the paper, you are talking about?

04:14:49 12 Q Uh-huh.

04:14:50 13 A I see it on the paper.

04:14:51 14 Q Yep. And the -- the caption says, "From  
04:14:54 15 Ceasar McDowell, Regarding Tory Lanez' Deposition  
04:14:56 16 Rumors."

04:14:57 17 That's a statement you wrote; right?

04:15:01 18 A The caption said what?

04:15:02 19 Q From Ceasar McDowell, regarding Tory Lanez'  
04:15:05 20 deposition rumors.

04:15:09 21 A I don't see that.

04:15:11 22 Q Okay. Look at mid-lower page.

04:15:18 23 A Are you talking about right here?

04:15:20 24 Q No. A little lower.

04:15:21 25 Right there. The one sentence. Here.

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04:15:27 1 A It says, "@ceasarmcdowell," not from  
04:15:31 2 Ceasar McDowell.  
04:15:32 3 Q No. It says, "From @ceasarmcdowell regarding  
04:15:33 4 hashtag" --  
04:15:35 5 A Yeah, yeah. It does say, "From @ceasar," but  
04:15:36 6 I didn't see that. Excuse me.  
04:15:37 7 Q Okay.  
04:15:37 8 A I'm not on social media. I'm a regular guy.  
04:15:40 9 Q Okay. But this is a statement you wrote?  
04:15:44 10 A I don't know who wrote it.  
04:15:45 11 Q Okay. Well, it has your name on it; so you  
04:15:47 12 approved it; right?  
04:15:48 13 A I don't know.  
04:15:48 14 Q You don't know if you approved a really bold  
04:15:51 15 statement posted both from your Instagram account and  
04:15:55 16 Unite the People, has your name up top in the  
04:15:57 17 screenshot, has your name on the bottom.  
04:15:59 18 Oh, wow. And, look, it has your verified  
04:16:03 19 Instagram account commenting on the same post.  
04:16:05 20 A Does it?  
04:16:06 21 Q Is that you?  
04:16:07 22 MR. HAYDEN: Objection. Argumentative.  
04:16:08 23 THE WITNESS: Well, I don't know -- just  
04:16:10 24 'cause you raised your voice, don't making it true.  
04:16:12 25 I've learned that.



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04:16:13 1 BY MS. HAYRAPETIAN:

04:16:13 2 Q Actually, I don't think I raised my voice.

04:16:15 3 A I do. But I'm just saying my opinion. My  
04:16:16 4 opinion and your opinion might be different.

04:16:18 5 But I don't -- I see where it says,

04:16:19 6 "Ceasar McDowell." I see where it says,

04:16:22 7 "Meghann Cuniff." I see where it says, "Tory's

04:16:25 8 lawyers." So what?

04:16:26 9 Q Okay. This is a statement you made; correct?

04:16:30 10 A I don't recall.

04:16:30 11 Q Okay. It's a statement you signed off on;  
04:16:32 12 right?

04:16:33 13 A I don't recall.

04:16:33 14 Q Actually, seems kind of ironic because you are  
04:16:37 15 kind of doing the same thing today; right?

04:16:39 16 A What is that?

04:16:40 17 Q Your "Good luck trying to get him to testify  
04:16:42 18 to anything."

04:16:43 19 MR. HAYDEN: Objection. Speculation.

04:16:44 20 BY MS. HAYRAPETIAN:

04:16:45 21 Q You've stated numerous times today that you  
04:16:47 22 are not going to tell me anything.

04:16:50 23 A I don't know nothing to tell you. I don't  
04:16:51 24 recall.

04:16:52 25 Q Why is UTP making public statements about

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04:17:02 1 Tory's deposition in Ms. Cooper's case?

04:17:05 2 A I don't recall.

04:17:06 3 Q Did Tory ask you to issue this press release?

04:17:10 4 MR. HAYDEN: Objection. Speculation. Lacks

04:17:11 5 foundation.

04:17:14 6 THE WITNESS: I don't recall.

04:17:14 7 BY MS. HAYRAPETIAN:

04:17:15 8 Q Tory told you ahead of time he wasn't going to

04:17:17 9 cooperate with his deposition, didn't he?

04:17:19 10 MR. HAYDEN: Objection. Speculation. Lacks

04:17:20 11 foundation.

04:17:21 12 THE WITNESS: I don't recall.

04:17:21 13 BY MS. HAYRAPETIAN:

04:17:22 14 Q You knew Tory was planning to refuse to answer

04:17:25 15 questions; correct?

04:17:25 16 MR. HAYDEN: Same objections.

04:17:27 17 THE WITNESS: I don't recall.

04:17:27 18 BY MS. HAYRAPETIAN:

04:17:28 19 Q But you didn't warn Ms. Pete's lawyers, did

04:17:30 20 you?

04:17:31 21 MR. HAYDEN: Same objections.

04:17:32 22 THE WITNESS: I don't recall.

04:17:33 23 Who is Ms. Pete?

04:17:34 24 BY MS. HAYRAPETIAN:

04:17:35 25 Q Instead you issued a press --

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04:17:38 1 A Who is Ms. Pete? I asked a question. You are  
04:17:39 2 not going to tell me. Okay. Go ahead.

04:17:42 3 Q Sir.

04:17:42 4 A I don't know who Ms. Pete is.

04:17:43 5 Q You are being disruptive because that's the  
04:17:45 6 eighth time you asked me who Ms. Pete is. And you know  
04:17:48 7 well, that both in the admonitions in my -- the  
04:17:51 8 beginning of my deposition and throughout the  
04:17:53 9 deposition, we have repeatedly answered and clarified  
04:17:55 10 who Ms. Pete is -- Megan Pete, Megan Thee Stallion.

04:17:59 11 A I forgot. I'm sorry.

04:18:00 12 Q Instead, you issued a press release supporting  
04:18:05 13 Tory's non-cooperation; correct?

04:18:08 14 A I don't recall.

04:18:10 15 Q UTP doesn't normally issue press releases  
04:18:16 16 about depositions, do they?

04:18:18 17 A I don't know.

04:18:19 18 Q You made an exception for Tory, didn't you?

04:18:25 19 A I don't know.

04:18:26 20 MR. HAYDEN: Objection. Speculation.

04:18:26 21 BY MS. HAYRAPETIAN:

04:18:27 22 Q This shows Tory uses UTP to shape public  
04:18:29 23 opinion, doesn't it?

04:18:30 24 MR. HAYDEN: Objection. Speculation.

04:18:32 25 THE WITNESS: No. I don't know nothing about

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04:18:33 1 that.

04:18:34 2 BY MS. HAYRAPETIAN:

04:18:34 3 Q What information did you communicate to

04:18:38 4 Ms. Cooper about Tory's deposition?

04:18:40 5 A That's -- that's the question?

04:18:47 6 Q Sure.

04:18:50 7 A What was it again? Say it again.

04:18:52 8 Q What information did you communicate to

04:18:54 9 Ms. Cooper about Tory's deposition?

04:18:56 10 A Can you read that back to me?

04:19:01 11 MS. HAYRAPETIAN: Go ahead. I don't think he

04:19:02 12 likes my voice anymore.

04:19:03 13 (The following record was read:

04:19:03 14 "QUESTION: What information did you

04:19:03 15 communicate to Ms. Cooper about Tory's

04:19:03 16 deposition?")

04:19:12 17 THE WITNESS: I don't recall ever

04:19:13 18 communicating anything to Ms. Cooper about anything.

04:19:15 19 BY MS. HAYRAPETIAN:

04:19:16 20 Q Okay.

04:19:19 21 MS. HAYRAPETIAN: Okay. Let's mark as

04:19:20 22 Exhibit 102, and if we can please pull up Tab 19 A-2,

04:19:26 23 which will be Exhibit 101 -- sorry -- 102-A, and the

04:19:31 24 transcript will be 102-B.

04:20:05 25 STENO TECH: Play the exhibit, Counsel?

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04:20:06 1 MS. HAYRAPETIAN: Yes. We can play, please.  
04:20:09 2 (Exhibit 102-A was marked for identification.)  
04:20:09 3 (Exhibit 102-B was marked for identification.)  
04:20:09 4 (A video clip was played.)  
04:21:25 5 BY MS. HAYRAPETIAN:  
04:21:27 6 Q This is from Ms. Cooper's live stream on  
04:21:30 7 April 15, 2025, right after Tory's deposition had been  
04:21:34 8 terminated for his misconduct. Ms. Cooper is referring  
04:21:37 9 to the press release you put out there before Tory's  
04:21:40 10 deposition that Tory would not cooperate with his  
04:21:43 11 deposition; correct?  
04:21:45 12 A I don't recall.  
04:21:46 13 Q You spoke to Tory before his deposition;  
04:21:49 14 correct?  
04:21:51 15 A I don't recall speaking to him ever.  
04:21:53 16 Q You told Tory not to cooperate; correct?  
04:21:55 17 MR. HAYDEN: Objection. Speculation. Lacks  
04:21:56 18 foundation.  
04:21:58 19 THE WITNESS: I ain't never tell nobody  
04:22:00 20 nothing.  
04:22:00 21 Who is Mrs. Henderson? You don't know? You  
04:22:11 22 don't remember?  
04:22:11 23 BY MS. HAYRAPETIAN:  
04:22:13 24 Q Mrs. Henderson is another attorney at our  
04:22:15 25 firm.

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04:22:16 1 A Okay. Thank you.

04:22:20 2 MS. HAYRAPETIAN: Let's mark as Exhibit 103,  
04:22:23 3 Tab 19 A-1, and the transcript will be B.

04:22:46 4 And if we can play 19 A-1 whenever you are ready.

04:22:50 5 (Exhibit 103-A was marked for identification.)

04:22:50 6 (Exhibit 103-B was marked for identification.)

04:22:51 7 (A video clip was played.)

04:23:32 8 BY MS. HAYRAPETIAN:

04:23:33 9 Q So we just heard Ms. Cooper's continuation of  
04:23:40 10 the live, and she's asserting that people are jealous of  
04:23:45 11 her because of her proximity and close relationship with  
04:23:48 12 Tory; right?

04:23:50 13 MR. HAYDEN: Objection. Speculation. Lacks  
04:23:51 14 foundation.

04:23:54 15 THE WITNESS: I don't know what she's saying.

04:23:55 16 I don't -- you'd have to ask her. I don't know.

04:23:58 17 BY MS. HAYRAPETIAN:

04:23:59 18 Q Well, we just listened together.

04:24:00 19 A That means you know.

04:24:01 20 Q "Some people who have some feelings about my  
04:24:03 21 proximity to Daystar."

04:24:07 22 A And?

04:24:08 23 Q You understand Ms. Cooper to be asserting that  
04:24:11 24 people are also jealous about her special relationship  
04:24:13 25 with Tory; right?

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04:24:15 1 A I don't know.

04:24:19 2 Q And Tory's dad where she says, "Tory daddy

04:24:23 3 love me. I think," quote -- "I think people feel a way

04:24:27 4 about the fact that Tory daddy loves me," unquote.

04:24:33 5 MR. HAYDEN: Same objections.

04:24:33 6 BY MS. HAYRAPETIAN:

04:24:34 7 Q Did you hear that?

04:24:35 8 A I see it on the paper. I don't know what it

04:24:38 9 means.

04:24:38 10 What does it mean?

04:24:40 11 Q Did you supply Ms. Cooper with any information

04:24:43 12 concerning Tory's conduct at his deposition?

04:24:46 13 MR. HAYDEN: Objection. Speculation. Lacks

04:24:47 14 foundation.

04:24:48 15 THE WITNESS: I don't know nothing about that.

04:24:49 16 BY MS. HAYRAPETIAN:

04:24:50 17 Q So despite Ms. Cooper publicly declaring how

04:24:58 18 much Tory and Tory's dad love her, and the fact that she

04:25:02 19 suddenly also became your client after Tory is your

04:25:04 20 client, you are saying you don't know anything about

04:25:08 21 that?

04:25:09 22 A Well, we have a lot of clients that became our

04:25:10 23 client after Tory became our client. I know that. But

04:25:14 24 I don't know anything about -- you should ask her. You

04:25:16 25 said you got her name on it.

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04:25:18 1 Q So give me another example of a client you got  
04:25:20 2 because of Tory? You just said you have a lot.  
04:25:26 3 A I got a lot of clients after Tory. I didn't  
04:25:27 4 say anything about a client that I got because of Tory.  
04:25:30 5 Q Well, we're talking specifically about  
04:25:33 6 Milagro Cooper --  
04:25:35 7 A Uh-huh.  
04:25:35 8 Q -- being your client --  
04:25:37 9 A Uh-huh.  
04:25:37 10 Q -- because Tory and her -- Tory's dad love her  
04:25:40 11 so much.  
04:25:42 12 A Then you should specifically ask her.  
04:25:45 13 MS. DIXON: Objection. Calls for speculation.  
04:25:46 14 MR. HAYDEN: Objection.  
04:25:47 15 BY MS. HAYRAPETIAN:  
04:25:48 16 Q So even with how much Tory, your client, and  
04:25:54 17 someone you talk to 97 times in a few months?  
04:25:58 18 A Who did I talk to 97 times?  
04:26:00 19 Q Tory.  
04:26:00 20 A Okay.  
04:26:01 21 Q Ms. Cooper is talking about how the person you  
04:26:08 22 talked to frequently loves her so much, and you are  
04:26:10 23 telling me you don't share information about each  
04:26:14 24 other's cases?  
04:26:16 25 MR. HAYDEN: Objection. Speculation.



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04:26:17 1 THE WITNESS: You said that somebody that I  
04:26:20 2 talk to frequently. I talk to his daddy frequently.  
04:26:24 3 BY MS. HAYRAPETIAN:  
04:26:25 4 Q Tory. I'm talking about Tory.  
04:26:26 5 A I thought you said, "Tory daddy loves me."  
04:26:28 6 Now you are saying that he loves her.  
04:26:29 7 Who loves who?  
04:26:30 8 Q Everyone loves everyone.  
04:26:31 9 A Okay. I love you too.  
04:26:37 10 Q Okay. Are you telling me Tory never told you  
04:26:43 11 to relay information to Ms. Cooper about his deposition  
04:26:45 12 in her cases?  
04:26:46 13 A Tory has never told me nothing about nothing.  
04:26:51 14 I don't remember him telling me nothing ever.  
04:26:55 15 Q What does that mean -- nothing about nothing?  
04:26:57 16 A I don't know. I don't remember.  
04:26:59 17 Q Okay. But you remember that he told you  
04:27:01 18 nothing about nothing?  
04:27:02 19 MR. HAYDEN: Objection. Vague and ambiguous.  
04:27:03 20 Argumentative.  
04:27:06 21 THE WITNESS: I don't remember.  
04:27:06 22 BY MS. HAYRAPETIAN:  
04:27:07 23 Q On May 14, 2025, UTP held a press conference  
04:27:13 24 accusing Roc Nation of trying to have Tory Lanez killed  
04:27:16 25 in prison to prevent the truth from coming out and

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04:27:22 1 exposing Ms. Pete as a purported perjurer.

04:27:27 2 Do you recall that?

04:27:29 3 A Can I answer? Can I answer that?

04:27:32 4 Q Uh-huh.

04:27:32 5 A Okay. You just said a whole lot of things  
04:27:35 6 that were wrong. You said Unite the People held a press  
04:27:39 7 conference that Unite the People said that Roc Nation --  
04:27:44 8 what did you say Roc Nation was supposed to try to kill  
04:27:47 9 him.

04:27:48 10 What did you say?

04:27:49 11 Q Do you disagree that Unite the People held a  
04:27:51 12 press conference accusing Roc Nation of trying to have  
04:27:54 13 Tory Lanez killed in prison?

04:27:55 14 A I 1,000 percent know that Unite the People --  
04:27:58 15 none of Unite the People staff has ever said that  
04:28:02 16 Roc Nation was trying to kill Tory Lanez in prison.

04:28:06 17 Q Okay. Let's take a look.

04:28:07 18 A Let's take a look.

04:28:08 19 MS. DIXON: Objection as to relevance. It's  
04:28:10 20 not during the time period of this lawsuit. Your  
04:28:12 21 lawsuit was October 24th -- or somewhere in 2024.  
04:28:16 22 That's when it started. This is after the pendency of  
04:28:20 23 the lawsuit, and none of the allegations in your  
04:28:21 24 complaint are covered by this activity.

04:28:26 25 MS. HAYRAPETIAN: Okay. Exhibit 104. Can we

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04:28:30 1 please pull up Tab 52-A-1?

04:28:34 2 MS. DIXON: It's not relevant. Objection.

04:28:35 3 I can't even see it.

04:28:45 4 MS. HAYRAPETIAN: And can we please raise the

04:28:51 5 volume?

04:29:03 6 Okay. I think we are ready to play.

04:29:04 7 (Exhibit 104-A was marked for identification.)

04:29:04 8 (Exhibit 104-B was marked for identification.)

04:29:20 9 (A video clip was played.)

04:29:21 10 BY MS. HAYRAPETIAN:

04:29:22 11 Q Okay. This is Walter Roberts from Unite the

04:29:23 12 People; right?

04:29:24 13 A That's him.

04:29:26 14 Q Okay. And what is his role at Unite the

04:29:32 15 People? Is he a lawyer?

04:29:35 16 A He is an employee.

04:29:36 17 Q Employee of -- what kind of employee would you

04:29:38 18 classify him as?

04:29:39 19 A One of the ones we pay. He is an employee.

04:29:42 20 Q Okay. And when he introduced himself at this

04:29:45 21 press conference, he called himself a "legal

04:29:47 22 consultant."

04:29:48 23 What does that mean?

04:29:48 24 A Oh, that -- that must mean he is a legal

04:29:50 25 consultant.

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04:29:51 1 Q Okay. What does that mean?

04:29:53 2 A That he consults legally.

04:29:57 3 Q What is Mr. Robert's involvement in Tory's

04:30:01 4 criminal case?

04:30:07 5 A He must be consulted legally, you just said.

04:30:10 6 Q What work did Mr. Roberts do on Tory's

04:30:14 7 criminal case?

04:30:15 8 A You'd have to ask him. I don't know.

04:30:17 9 Q As the CEO of Unite the People, you don't know

04:30:20 10 what work your employee did on a case?

04:30:23 11 A No. Does your employer know every work you do

04:30:26 12 on every case?

04:30:27 13 Q What is Mr. Roberts' involvement with this

04:30:30 14 civil lawsuit?

04:30:34 15 A I couldn't possibly know.

04:30:35 16 Q He doesn't work on Ms. Cooper's case?

04:30:36 17 A I couldn't possibly know.

04:30:38 18 Q Okay. Before the press conference, did you

04:30:40 19 know Mr. Roberts was going to accuse Roc Nation and

04:30:43 20 Ms. Pete of being involved in Tory's stabbing?

04:30:46 21 MR. HAYDEN: Objection. Speculation. Lacks

04:30:47 22 foundation.

04:30:50 23 MS. HAYRAPETIAN: Actually, guys, the

04:30:51 24 foundation is set. So we're looking at a statement from

04:30:54 25 Walter Roberts, quote, "The only party that responded

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04:30:58 1 was last week, was Megan Pete's representatives with a  
04:31:02 2 request for more information. A few days later,  
04:31:04 3 Mr. Peterson is brutally attacked in a jail cell."

04:31:07 4 MR. HAYDEN: Okay. Objection. Speculation.

04:31:09 5 MS. DIXON: Objection. It's also outside of  
04:31:10 6 the scope of your complaint.

04:31:13 7 BY MS. HAYRAPETIAN:

04:31:14 8 Q Did you approve Mr. Robert's statement  
04:31:16 9 before he made it?

04:31:18 10 MS. DIXON: Objection. Relevance.

04:31:20 11 THE WITNESS: Now, you are asking a couple  
04:31:21 12 different questions. The original question that you  
04:31:23 13 asked me was, did Unite the People's staff say that  
04:31:28 14 Roc Nation tried to kill Tory Lanez. And from what the  
04:31:30 15 video you just showed me and the piece of paper you are  
04:31:33 16 putting in front of me, nowhere on here does it say  
04:31:36 17 anything about Unite the People saying Roc Nation tried  
04:31:40 18 to kill Tory Lanez.

04:31:41 19 BY MS. HAYRAPETIAN:

04:31:41 20 Q Okay. So let's take it one by one.

04:31:43 21 A Let's do it.

04:31:44 22 Q What does it say. Can you tell me what it  
04:31:46 23 says?

04:31:46 24 A "The."

04:31:47 25 Q Okay.

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04:31:48 1 A "Later." There's a word "request." That's a  
04:31:51 2 lot.

04:31:52 3 Q No. It says, "The only party that responded  
04:31:56 4 was Megan Pete's representatives."

04:31:57 5 And what does that mean to you -- Megan Pete's  
04:32:00 6 representatives?

04:32:01 7 A It doesn't mean Roc Nation is trying to kill  
04:32:03 8 Tory Lanez. I don't see that nowhere. I don't see  
04:32:06 9 Unite the People staff saying that. I -- I see what you  
04:32:08 10 said right here, and what he said right there. And not  
04:32:11 11 at one point, did he say Roc Nation's attorneys, or  
04:32:15 12 whoever else, tried to kill Tory Lanez in prison.

04:32:20 13 Q Okay.

04:32:20 14 A I don't know what you see on them three lines,  
04:32:22 15 but I don't see that.

04:32:23 16 Q Sure. And then it says, "A few days later  
04:32:25 17 Mr. Peterson is brutally attacked in a jail cell";  
04:32:28 18 so --

04:32:28 19 A I don't see it saying by Roc Nation or their  
04:32:30 20 lawyers.

04:32:30 21 Q Well, it says, "Megan Pete's representatives."

04:32:33 22 A It says, "Megan Pete's representatives  
04:32:35 23 attacked him in his jail cell"?

04:32:38 24 Q It says -- it makes an inference that --

04:32:39 25 A No, it didn't.

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04:32:40 1 Q So do you disagree that these two sentences  
04:32:44 2 stated back-to-back makes an inference that --

04:32:47 3 A 100 percent.

04:32:47 4 Q Okay.

04:32:48 5 MR. HAYDEN: And I'm going to object to  
04:32:50 6 speculation again.

04:32:53 7 MS. HAYRAPETIAN: Marking as Exhibit 105, and  
04:33:00 8 if we can pull 52 A-2 which will be Exhibit 104-A and  
04:33:05 9 the transcript will be 104-B -- sorry -- 105-B.

04:33:10 10 And if we can also raise the volume.

04:33:36 11 (Exhibit 105-A was marked for identification.)

04:33:36 12 (Exhibit 105-B was marked for identification.)

04:33:36 13 (A video clip was played.)

04:33:51 14 STENO TECH: I have it at max volume, Counsel,  
04:33:52 15 but I'll see what I can do.

04:34:24 16 BY MS. HAYRAPETIAN:

04:34:24 17 Q This is Gianni Caldwell?

04:34:27 18 A Is that a question to me?

04:34:29 19 Q Yeah.

04:34:30 20 A Yes.

04:34:30 21 Q Okay. And how do you know Gianni Caldwell?

04:34:36 22 A I think he is a Fox commentator on TV or  
04:34:39 23 something.

04:34:43 24 Q And what's his affiliation with UTP?

04:34:45 25 A Nothing at all.

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04:34:45 1 Q He just came and spoke at your press  
04:34:47 2 conference?

04:34:48 3 A Yes.

04:34:49 4 Q Is that because you are affiliated with the  
04:34:51 5 Republican Party?

04:34:53 6 MR. HAYDEN: Objection. Relevance.

04:34:54 7 THE WITNESS: The Republican Party? I don't  
04:34:57 8 know nothing about any of that.

04:35:00 9 BY MS. HAYRAPETIAN:

04:35:00 10 Q You are not interested in politics?

04:35:03 11 A Prison politics.

04:35:03 12 Q What does that mean?

04:35:05 13 A I don't know.

04:35:07 14 Q You are not interested in global politics?

04:35:11 15 A I don't remember anything about global  
04:35:13 16 politics.

04:35:13 17 What type of politics are in the global?

04:35:16 18 Q Political relations within the United States.

04:35:18 19 Is that not a topic that is of, you know,  
04:35:22 20 primary importance to you?

04:35:23 21 A I don't know. I don't remember any topics  
04:35:26 22 that are primary importance to me.

04:35:28 23 Q Okay. When did you first meet Mr. Caldwell?

04:35:32 24 A I don't remember.

04:35:37 25 Q What is Mr. Caldwell's involvement with



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04:35:39 1 Tory's criminal case?

04:35:41 2 A I don't remember. I just told you -- I don't  
04:35:44 3 know Gianni Caldwell. He is a Fox commentator.

04:35:48 4 Q But he is speaking at your press conference?

04:35:50 5 MS. DIXON: Objection. That assumes facts not  
04:35:51 6 in evidence.

04:35:52 7 THE WITNESS: Yeah. I don't know.

04:35:52 8 BY MS. HAYRAPETIAN:

04:35:53 9 Q Before the press conference, did you know  
04:35:59 10 Mr. Caldwell was going to insinuate Roc Nation, and  
04:36:02 11 Ms. Pete, of being involved in Tory's stabbing?

04:36:04 12 MR. HAYDEN: Objection. Speculation.

04:36:06 13 THE WITNESS: I don't remember nothing like  
04:36:07 14 that.

04:36:07 15 BY MS. HAYRAPETIAN:

04:36:08 16 Q You didn't ask him to share his view points  
04:36:10 17 before you invited him to speak at your press  
04:36:12 18 conference?

04:36:13 19 MR. HAYDEN: Objection. Speculation.  
04:36:14 20 Argumentative.

04:36:15 21 THE WITNESS: Who said I invited him?

04:36:16 22 BY MS. HAYRAPETIAN:

04:36:16 23 Q How did he end up at your press conference?

04:36:19 24 A I don't know. But you just said I invited  
04:36:21 25 him. I told you that I don't know him.

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04:36:23 1 Q Okay. Well, you let him speak at your press  
04:36:25 2 conference; right?

04:36:28 3 A I don't remember who let him. He spoke.

04:36:31 4 Q Well, you hosted the press conference;  
04:36:32 5 correct?

04:36:33 6 A Yes.

04:36:34 7 Q Okay. So, as a host, you gave him a platform  
04:36:38 8 to speak; right?

04:36:40 9 A Uh-huh. No.

04:36:41 10 Q Okay. So he just showed up there and spoke  
04:36:43 11 without knowing what was happening that day, where it  
04:36:47 12 was, what it was about? And he started speaking, and  
04:36:50 13 you allowed him to continue; is that correct?

04:36:53 14 A I don't really remember how it happened. I  
04:36:59 15 know he spoke there, though. You can clearly see it on  
04:37:01 16 the video. Handsome young man, spoke very clearly, but  
04:37:04 17 I don't know who allowed him or anything about him.

04:37:10 18 Q Did you approve his statements?

04:37:13 19 A I don't even remember his statements. I had  
04:37:17 20 nothing to do with his statements.

04:37:20 21 Q Okay. Did you or anyone at UTP pay  
04:37:21 22 Mr. Caldwell to make the statements he made during  
04:37:25 23 your press conference?

04:37:26 24 MR. HAYDEN: Objection. Speculation.

04:37:27 25 THE WITNESS: Not at all.

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04:37:31 1 MS. HAYRAPETIAN: Let's mark as Exhibit  
04:37:32 2 Number 106, Tab 52 A-3. And, again, the video clip will  
04:37:43 3 be A, and B will be the transcript.  
04:38:43 4 (Exhibit 106-A was marked for identification.)  
04:38:43 5 (Exhibit 106-B was marked for identification.)  
04:38:44 6 (A video clip was played.)  
04:38:44 7 BY MS. HAYRAPETIAN:  
04:38:44 8 Q Who is that?  
04:38:46 9 A Are you asking me?  
04:38:47 10 Q Yeah.  
04:38:47 11 A Who that is?  
04:38:48 12 Q Yeah.  
04:38:48 13 A What did it say under there? Did it say who  
04:38:50 14 she was?  
04:38:51 15 Q I'm not sure.  
04:38:52 16 A I didn't see it. I didn't see it.  
04:38:53 17 Q Do you recognize her?  
04:38:55 18 A That paper -- are you talking about the lady  
04:38:58 19 in the front?  
04:38:59 20 Q Correct. The one speaking in front of  
04:39:01 21 Mr. Hayden.  
04:39:02 22 A I don't know who is speaking. But the lady in  
04:39:03 23 the front, I met her before. I don't really know her.  
04:39:08 24 Q When did you meet her?  
04:39:10 25 A I don't remember.

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04:39:11 1 Q Okay. So that's Diana London.

04:39:14 2 A Is it?

04:39:14 3 Q Does that sound familiar?

04:39:15 4 A Might be.

04:39:16 5 MS. DIXON: Objection. Relevance to this

04:39:17 6 case, to the complaint. It is irrelevant to any of the

04:39:22 7 facts in your complaint of October of 2024.

04:39:25 8 MS. HAYRAPETIAN: Counsel, please stop with

04:39:26 9 the speaking objections. Relevance is not an

04:39:29 10 appropriate objection.

04:39:30 11 MS. DIXON: It actually is.

04:39:32 12 MS. HAYRAPETIAN: It is not.

04:39:32 13 MS. DIXON: You are assuming the scope of your

04:39:33 14 own --

04:39:34 15 MS. HAYRAPETIAN: And if you continue to

04:39:35 16 interrupt --

04:39:36 17 MS. DIXON: What are you going to do if I

04:39:37 18 continue?

04:39:38 19 MS. HAYRAPETIAN: If you continue to interrupt

04:39:40 20 my questioning and other people's questioning throughout

04:39:42 21 this litigation, we are going to have to go to the court

04:39:45 22 and the magistrate and ask for an order to only allow

04:39:53 23 for form objections.

04:39:54 24 MS. DIXON: Okay. I'm objecting to form

04:39:56 25 because your question is compound, ambiguous --

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04:39:57 1 MS. HAYRAPETIAN: Great. Great.

04:39:58 2 MS. DIXON: -- irrelevant.

04:39:59 3 MS. HAYRAPETIAN: Object. Form. Period -- is

04:40:00 4 enough. Stop interrupting my questioning and

04:40:03 5 continually coaching this witness. Who is not even your

04:40:07 6 client, by the way.

04:40:08 7 MS. DIXON: I'm not coaching the witness. I'm

04:40:09 8 making objections.

04:40:11 9 MS. HAYRAPETIAN: Okay. That's not a proper

04:40:12 10 objection. Please stop interrupting me.

04:40:15 11 MS. DIXON: Please stop telling me what I'm

04:40:17 12 doing when I'm not coaching the witness, and I wouldn't.

04:40:19 13 BY MS. HAYRAPETIAN:

04:40:20 14 Q So Diana London is speaking at the press

04:40:23 15 conference you are hosting; correct?

04:40:25 16 A Yes.

04:40:26 17 Q Okay. And she is saying Tory was stabbed 14

04:40:33 18 times, and she's pointing out that this was after

04:40:36 19 two years in prison without incident. And then she

04:40:39 20 says, "It was just days after a major news outlet

04:40:43 21 reached out to Megan Pete's team, Kelsey Harris and

04:40:47 22 former DA, George Gascon about a story on new evidence

04:40:51 23 in this case."

04:40:52 24 And looking at your employee, Walter Roberts,

04:40:57 25 employee of Unite the People, legal consultant, he says,

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04:40:59 1 "The only party that responded was last week was Megan  
04:41:04 2 Pete's representatives."  
04:41:05 3 Coming back to Diana London's statement, she  
04:41:09 4 says, "You don't have to believe in conspiracy theories  
04:41:11 5 to see the pattern. When evidence was about to come to  
04:41:16 6 light, Tory was nearly killed. So let's stop pretending  
04:41:20 7 this is complicated."  
04:41:21 8 You agree she is saying, as Walter Roberts  
04:41:31 9 inferred, Megan Pete's representatives nearly killed  
04:41:36 10 Tory after a national news outlet reached out to her  
04:41:41 11 team; right?  
04:41:42 12 MR. HAYDEN: Objection. Speculation.  
04:41:43 13 Compound.  
04:41:44 14 THE WITNESS: No. I agree that you're  
04:41:46 15 absolutely wrong.  
04:41:46 16 Again, Walter Roberts, who is an employee of  
04:41:50 17 Unite the People, said nothing about Roc Nation's  
04:41:53 18 lawyers stabbing Tory Lanez in prison. It's two  
04:41:56 19 sentences right there that I'm reading, ma'am. I don't  
04:41:58 20 see that.  
04:41:59 21 Now, Diana London, what she said or  
04:42:02 22 inferred -- I don't know. You would have to ask her.  
04:42:05 23 BY MS. HAYRAPETIAN:  
04:42:06 24 Q This is at a press conference you hosted, you  
04:42:12 25 commenced, you were the opening speaker, and you have at

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04:42:16 1 least three people pointing the finger at Megan Pete,  
04:42:21 2 and her representatives. And any reasonable person,  
04:42:28 3 after they watched your press conference, would assume  
04:42:31 4 you are accusing Megan Pete and her representatives of  
04:42:35 5 killing Tory Lanez; correct?

04:42:37 6 MR. HAYDEN: Same objections.

04:42:39 7 THE WITNESS: Well, I don't think Tory Lanez  
04:42:40 8 has been killed, but you just said he was.

04:42:42 9 But, no, you are not correct. Any reasonable  
04:42:45 10 person would know that Walter Roberts was introduced,  
04:42:50 11 like you said, as the senior consultant and I think the  
04:42:53 12 other two people were not.

04:42:54 13 So, no, I don't think any reasonable person  
04:42:56 14 would possibly think that. I think it's a reach that  
04:42:59 15 you are trying for.

04:43:00 16 BY MS. HAYRAPETIAN:

04:43:00 17 Q I'm sorry. So what does Robert -- Robert  
04:43:10 18 being a senior consultant, and the other two people not  
04:43:13 19 being senior consultants -- how does that translate into  
04:43:18 20 a reasonable -- reasonable people not thinking that  
04:43:22 21 they're accusing Megan Pete and her representatives of  
04:43:26 22 nearly killing Tory Lanez?

04:43:27 23 MS. DIXON: Objection to form.

04:43:28 24 MR. HAYDEN: Objection to form. Compound.

04:43:30 25 BY MS. HAYRAPETIAN:

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04:43:30 1 Q What's the logic. Explain that to me.

04:43:33 2 A The logic is, again, I don't know who Robert

04:43:36 3 Roberts is, what you just said, but this is

04:43:37 4 Walter Roberts. Walter Roberts is part of our staff.

04:43:39 5 Q Right.

04:43:40 6 A That's Unite the People.

04:43:41 7 Q Uh-huh.

04:43:42 8 A Said nothing about Roc Nation going --

04:43:46 9 sneaking into prison and killing Tory Lanez or attempted

04:43:49 10 to kill him or whatever.

04:43:50 11 Now, you are insinuating that these people

04:43:53 12 did; so, if these people did, you would have to ask

04:43:56 13 them.

04:43:56 14 As far as Unite the People's staff goes, he

04:43:59 15 did not say that. That's what I'm saying.

04:44:02 16 Q Okay. Well, we all just heard and read what

04:44:04 17 all three people said at your press conference, within

04:44:08 18 minutes of each other.

04:44:15 19 MR. HAYDEN: Objection. No question asked.

04:44:23 20 BY MS. HAYRAPETIAN:

04:44:24 21 Q What is Diana London's affiliation with UTP?

04:44:34 22 A That was a question to me?

04:44:35 23 Q That was a question, yeah.

04:44:36 24 A I don't think there is any. I don't know.

04:44:39 25 You'd have to ask her if she -- I don't know anything



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04:44:43 1 about her affiliations with Unite the People.

04:44:45 2 Q Okay.

04:44:46 3 MS. HAYRAPETIAN: Okay. Let's mark as

04:44:47 4 Exhibit 107, and could we, please, pull up Tab 45-A.

04:45:27 5 (Exhibit 107-A was marked for identification.)

04:45:27 6 (Exhibit 107-B was marked for identification.)

04:45:27 7 (A video clip was played.)

04:46:04 8 BY MS. HAYRAPETIAN:

04:46:05 9 Q So that's your client -- former client,

04:46:08 10 Milagro Cooper, watching your press conference on live

04:46:14 11 stream where she also streamed the entire press

04:46:17 12 conference; and immediately after, she is saying, "They

04:46:22 13 absolutely implicated Roc Nation in the, quote,

04:46:25 14 attempted murder of Daystar Peterson on national news."

04:46:30 15 That's what you saw. That is exactly what you saw.

04:46:33 16 Your client, Ms. Cooper, reasonable person; right?

04:46:37 17 A Is that a question for me?

04:46:38 18 MR. HAYDEN: Objection. Speculation.

04:46:39 19 BY MS. HAYRAPETIAN:

04:46:39 20 Q That is a question for you.

04:46:40 21 A I'm sorry. I didn't mean to overtalk you,

04:46:42 22 sir.

04:46:44 23 MS. DIXON: Objection. Relevance.

04:46:46 24 THE WITNESS: Okay. Well, what I just

04:46:48 25 heard -- again, I don't know what you heard. But when

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04:46:52 1 she says they absolutely implicated and he absolutely  
04:46:56 2 did that, at no point did she name Walter Roberts, who  
04:47:00 3 is the staff of Unite the People, again, saying anything  
04:47:04 4 about Roc Nation or killing anybody or attempting to  
04:47:06 5 kill anybody or anything like that.

04:47:08 6 BY MS. HAYRAPETIAN:

04:47:09 7 Q Would you like me to pull the whole video so  
04:47:10 8 we can watch everything she talks about?

04:47:13 9 A I wouldn't care what you pull. There's  
04:47:15 10 nothing that Unite the People -- you are not going to be  
04:47:17 11 able to dance around and stretch and say anybody on  
04:47:20 12 Unite the People's staff said anything that Roc Nation  
04:47:25 13 or their lawyers went into the prison and tried to stab  
04:47:29 14 Tory Lanez or have him stabbed or whatever you want to  
04:47:31 15 say. That's a reach. It was never said.

04:47:35 16 You can try to imply it all you want to. It  
04:47:37 17 was never said.

04:47:41 18 Q Do you remember who introduced you to  
04:47:42 19 Diana London?

04:47:44 20 A I don't remember.

04:47:45 21 Q Okay. Diana London calls herself a "fixer."  
04:47:49 22 Did you know that?

04:47:49 23 A I don't know anything about that.

04:47:51 24 Q You hired Diana London to fix Tory's  
04:47:53 25 situation; right?

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04:47:55 1 MR. HAYDEN: Objection. Speculation.

04:47:57 2 THE WITNESS: Not at all.

04:47:58 3 MS. DIXON: Objection. Irrelevant to your

04:47:59 4 complaint.

04:48:00 5 BY MS. HAYRAPETIAN:

04:48:00 6 Q This was around the time that UTP decided they

04:48:03 7 no longer wanted to represent Ms. Cooper as a client;

04:48:05 8 correct?

04:48:07 9 A I just said not at all; so how could you say

04:48:10 10 that? I just said, "No."

04:48:12 11 Q You found a new fixer to replace Ms. Cooper;

04:48:15 12 right?

04:48:15 13 MR. HAYDEN: Objection. Speculation.

04:48:17 14 Argumentative. Lacks foundation.

04:48:19 15 THE WITNESS: I found a new fixer to fix

04:48:21 16 Cooper?

04:48:21 17 BY MS. HAYRAPETIAN:

04:48:22 18 Q You found a new fixer to replace Ms. Cooper.

04:48:27 19 A Uh-huh. I found a new fixer -- that don't

04:48:30 20 even make sense. That don't -- I found a new fixer to

04:48:33 21 fix Cooper -- to replace Cooper.

04:48:36 22 Cooper was my fixer?

04:48:39 23 Q That's right.

04:48:39 24 A Is that what you are saying?

04:48:41 25 Q Right.

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04:48:41 1 MR. HAYDEN: Objection has been noted.

04:48:43 2 THE WITNESS: That's hilarious.

04:48:44 3 BY MS. HAYRAPETIAN:

04:48:45 4 Q Do you disagree?

04:48:47 5 A 100 percent.

04:48:48 6 Q Okay. How did you connect with the MAGA

04:48:53 7 figures Diana London and Congresswoman Luna?

04:48:59 8 A Who?

04:49:00 9 Q Congresswoman Luna, Anna Paulina Luna?

04:49:04 10 A Who is that? You said that I connected with

04:49:05 11 them?

04:49:06 12 Q You don't know who that is?

04:49:07 13 A Have you ever seen me talk to that -- who is

04:49:09 14 that? Luna? Congresswoman Luna?

04:49:11 15 Q Congresswoman --

04:49:12 16 A You are saying that I talked to her?

04:49:13 17 Q I'm saying, how did you get connected to

04:49:16 18 Diana London?

04:49:18 19 A Who said I was connected? I'm trying to

04:49:18 20 figure out how I was connected. I don't know them.

04:49:18 21 Q Are you denying knowing?

04:49:20 22 A I 100 percent don't know her.

04:49:22 23 MS. DIXON: Objection. Relevance to this

04:49:23 24 complaint.

04:49:24 25 BY MS. HAYRAPETIAN:

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04:49:24 1 Q Did you promise political support in exchange  
04:49:26 2 for the Republican Party's help with Tory?

04:49:29 3 MR. HAYDEN: Objection. Speculation. Lacks  
04:49:30 4 foundation.

04:49:31 5 THE WITNESS: Did I promise political -- not  
04:49:33 6 at all. To who? Who would I promise it to?

04:49:36 7 BY MS. HAYRAPETIAN:

04:49:37 8 Q Who are you been requesting to pardon Tory?

04:49:41 9 MS. DIXON: Objection.

04:49:42 10 THE WITNESS: I haven't.

04:49:43 11 MS. DIXON: Irrelevant to this complaint.

04:49:44 12 BY MS. HAYRAPETIAN:

04:49:44 13 Q Did you pay Diana London to make these  
04:49:47 14 statements?

04:49:48 15 MR. HAYDEN: Objection. Speculation.

04:49:49 16 THE WITNESS: Not at all.

04:49:50 17 BY MS. HAYRAPETIAN:

04:49:50 18 Q Did anyone at UTP pay Diana London to make  
04:49:54 19 these statements?

04:49:56 20 A Not at all.

04:49:59 21 Q Did UTP have anything to do with the stabbing  
04:50:18 22 of Tory Lanez?

04:50:20 23 MR. HAYDEN: Objection. Asked and answered.

04:50:21 24 THE WITNESS: Did you? Don't ask me nothing  
04:50:25 25 dumb like that because I will respond dumb, "Did you."

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04:50:27 1 BY MS. HAYRAPETIAN:

04:50:27 2 Q So are you accusing Megan Pete and her  
04:50:29 3 representatives --

04:50:31 4 A I don't know.

04:50:31 5 MR. HAYDEN: Objection. Speculation.

04:50:32 6 MS. HAYRAPETIAN: -- of being involved? Is  
04:50:33 7 that what I just heard?

04:50:35 8 A You just heard is it you. Why are you asking  
04:50:36 9 me did I stab Tory Lanez? What is wrong with you? Did  
04:50:38 10 you stab Tory Lanez? That's what I heard.

04:50:40 11 Q That's not what I asked. That's not what I  
04:50:41 12 asked.

04:50:41 13 A What did you say? Well, maybe I heard it  
04:50:43 14 wrong. I apologize if I'm wrong.

04:50:45 15 MS. HAYRAPETIAN: I'm sure Ms. Court Reporter  
04:50:47 16 could read back the transcript.

04:50:59 17 THE COURT REPORTER: What did you want me to  
04:51:00 18 read?

04:51:00 19 MS. HAYRAPETIAN: My last question.

04:51:00 20 (The following record was read:

04:51:00 21 "QUESTION: Did UTP have anything to do  
04:51:00 22 with the stabbing of Tory Lanez?")

04:51:00 23 THE WITNESS: And my reply to that was, "Did  
04:51:02 24 you."

04:51:03 25 Why you asking me something stupid like that?

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04:51:05 1 If we don't get defensive, we won't get  
04:51:14 2 offensive. But come on now. Now, you getting  
04:51:17 3 disrespectful. I'll get up and walk on out of here.  
04:51:25 4 MR. HAYDEN: I would object to Fifth  
04:51:26 5 Amendment --  
04:51:27 6 THE WITNESS: Matter fact, I'm about to go  
04:51:28 7 outside and smoke. You don't have a question right now.  
04:51:31 8 MR. HAYDEN: No need.  
04:51:36 9 MS. HAYRAPETIAN: I will take that --  
04:51:38 10 THE WITNESS: You are going to ask me, did I  
04:51:40 11 have something to do with stabbing? What's wrong with  
04:51:42 12 you? You are sick.  
04:51:43 13 MS. HAYRAPETIAN: I will take --  
04:51:43 14 THE WITNESS: You are -- you are sick in your  
04:51:44 15 head.  
04:51:45 16 MS. HAYRAPETIAN: I will take --  
04:51:45 17 THE WITNESS: You really need to get it  
04:51:46 18 together.  
04:51:46 19 MS. HAYRAPETIAN: I will take --  
04:51:46 20 THE WITNESS: You asked me something offensive  
04:51:49 21 like that. Did you have something to do with them  
04:51:51 22 stabbing him? What's wrong with you? Somebody got  
04:51:52 23 stabbed. If that was your friend or your family, would  
04:51:55 24 you be asking that dumbass question?  
04:51:58 25 MR. HAYDEN: Ceasar, you got to settle down,

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04:51:59 1 buddy. Come on.

04:52:00 2 MS. HAYRAPETIAN: Let's --

04:52:03 3 MS. DIXON: I think it's discovery abuse

04:52:04 4 because it's not in your complaint.

04:52:06 5 THE COURT REPORTER: We're on the record.

04:52:07 6 MS. HAYRAPETIAN: Let's go off the record.

04:52:09 7 THE VIDEOGRAPHER: The time is 4:52 PM

04:52:11 8 Pacific time. We are now off the record.

04:52:15 9 (Recess was taken.)

05:13:14 10 THE VIDEOGRAPHER: The time is 5:13 PM

05:13:33 11 Pacific time. We are back on the record.

05:13:34 12 BY MS. HAYRAPETIAN:

05:13:35 13 Q Okay. We just took a quick break.

05:13:42 14 Mr. McDowell, have you had a time to calm

05:13:46 15 down and compose yourself?

05:13:48 16 Okay. No answer.

05:13:54 17 MS. HAYRAPETIAN: And I will just reflect for

05:13:58 18 the record, because I'm not sure if it picked it up, but

05:14:05 19 while a question was pending, the witness walked off,

05:14:10 20 left the room, while he was still speaking, and he

05:14:14 21 called me a -- a "Bitch" and asked what the fuck is

05:14:26 22 wrong with me. And --

05:14:30 23 MR. HAYDEN: Wait, did he use that word?

05:14:32 24 MS. HAYRAPETIAN: Yes. And people outside

05:14:33 25 heard, and they asked if I wanted security called up;



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05:14:35 1 so --

05:14:38 2 MS. DIXON: Let's also let the record reflect  
05:14:41 3 the question that you asked just previous to that was  
05:14:43 4 whether or not he had anything to do with the stabbing  
05:14:45 5 of his friend, Daystar Peterson.

05:14:47 6 MS. HAYRAPETIAN: I think the record is clear  
05:14:49 7 without Counsel's continued coaching and interruptions.

05:14:52 8 MS. DIXON: That's not a coaching. It's a  
05:14:54 9 clarification of the record.

05:14:55 10 MS. HAYRAPETIAN: And delaying -- the  
05:14:56 11 record -- the record does not need your clarification.  
05:14:57 12 Thank you very much.

05:14:58 13 MS. DIXON: Well, you just gave your  
05:14:59 14 clarification, which it didn't need, because he was  
05:15:01 15 already still on the record.

05:15:06 16 BY MS. HAYRAPETIAN:

05:15:06 17 Q Okay. Moving on, was Walter Roberts an  
05:15:14 18 attorney at UTP at any point?

05:15:17 19 A I don't remember.

05:15:18 20 Q Okay.

05:15:28 21 MS. HAYRAPETIAN: Let's take a look at Tab 46,  
05:15:34 22 please and mark it as Exhibit Number 108.

05:15:42 23 BY MS. HAYRAPETIAN:

05:15:42 24 Q Has Walter Roberts been working on  
05:15:47 25 Ms. Cooper's case?

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05:15:48 1 A I don't remember.

05:15:56 2 MS. HAYRAPETIAN: Actually, can you give me

05:15:58 3 55?

05:15:58 4 Q Did you text Ms. Cooper at any point and say

05:16:02 5 "Hey, when you get a chance, answer your phone. Walter

05:16:06 6 is trying to give you a call from my office"?

05:16:10 7 A I don't remember.

05:16:14 8 MS. HAYRAPETIAN: Let's mark this as 108.

05:16:30 9 (Exhibit 108 was marked for identification.)

05:16:31 10 BY MS. HAYRAPETIAN:

05:16:31 11 Q This was produced from Ms. Cooper's phone, and

05:16:33 12 this is a text message on November 12, 2024. And it

05:16:40 13 states, "From Ceasar McDowell, Hey, when you get a

05:16:43 14 chance, answer your phone. Walter is trying to give you

05:16:45 15 a call from my office. It will be a 562 number. I just

05:16:49 16 tried to call you twice, but it didn't go. Walter

05:16:55 17 should be sending you a text. He is on the legal team

05:16:58 18 here. He just wants to update you."

05:17:02 19 So do you now recall whether Walter was on

05:17:08 20 Ms. Cooper's legal team?

05:17:11 21 A I don't remember.

05:17:11 22 Q But you see your text message?

05:17:13 23 A Nope.

05:17:14 24 Q You don't see your text message?

05:17:16 25 A No.

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05:17:16 1 Q Why not?

05:17:17 2 A Because I don't see it.

05:17:19 3 Q But the exhibit is right in front of you.

05:17:22 4 A I see the exhibit.

05:17:23 5 Q Okay. And did you read the language as I read

05:17:25 6 along with it?

05:17:26 7 A No.

05:17:27 8 Q Can you please read the language?

05:17:28 9 A I read it now. I didn't read along with you.

05:17:32 10 Q Okay. So do you see where you said --

05:17:33 11 A I see where somebody types something on a

05:17:35 12 paper. Yes, I see it.

05:17:37 13 Q And that's your phone number, we've

05:17:39 14 established earlier, or was your phone number?

05:17:41 15 A That used to be a number.

05:17:42 16 Q Okay. And that's your name and Ms. Cooper's

05:17:44 17 phone, and this is a text message to Ms. Cooper.

05:17:46 18 A That's my name. Somebody typed my name on the

05:17:49 19 paper.

05:17:50 20 Q Yes.

05:17:50 21 A Oh, yeah, they did.

05:17:51 22 Q Okay. So you are accusing us of fabricating

05:17:54 23 this exhibit.

05:17:55 24 Am I hearing that correctly?

05:17:58 25 MR. HAYDEN: Objection. Argumentative.

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05:17:59 1 THE WITNESS: I said my name was typed on a  
05:18:00 2 paper. Anything else you assumed.  
05:18:02 3 BY MS. HAYRAPETIAN:  
05:18:03 4 Q Okay. So you're refusing to look at the  
05:18:05 5 exhibit?  
05:18:06 6 A I just looked at it. I just told you I looked  
05:18:08 7 at it.  
05:18:08 8 Q Okay. And that's a text message from you;  
05:18:10 9 correct?  
05:18:11 10 A There's a -- words typed on the paper with my  
05:18:14 11 name. I don't know who that's a text message from.  
05:18:16 12 Q Okay. So are you refuting that you sent the  
05:18:20 13 text messages here next to your name; is that correct?  
05:18:24 14 A I'm telling you I don't remember.  
05:18:27 15 Q And reading this exhibit did not help you  
05:18:29 16 remember.  
05:18:29 17 Is that what you are saying?  
05:18:36 18 A I just told you, "I don't remember."  
05:18:37 19 Q Okay. You texted Ms. Cooper, telling her that  
05:18:39 20 Walter Roberts was on the legal team and he wanted to  
05:18:43 21 talk to her.  
05:18:44 22 What did Walter wanted to talk to Ms. Cooper  
05:18:47 23 about?  
05:18:49 24 MS. DIXON: Objection. Attorney-client  
05:18:50 25 privilege. And work product.

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05:18:52 1 MS. HAYRAPETIAN: Are you his counsel?

05:18:53 2 MS. DIXON: I can get to object. I can

05:18:54 3 object, if I want to.

05:18:55 4 MS. HAYRAPETIAN: No, you actually can't. He

05:18:57 5 is not your witness.

05:18:58 6 MS. DIXON: He was prior counsel for my

05:18:59 7 client; so, therefore, there's a succession -- I'm a

05:19:02 8 successor in interest.

05:19:04 9 MR. HAYDEN: She beat me to it.

05:19:04 10 I'll object to attorney-client privilege.

05:19:07 11 BY MS. HAYRAPETIAN:

05:19:07 12 Q Okay. Walter also prepared Sonstar for his

05:19:10 13 deposition; correct?

05:19:12 14 MR. HAYDEN: Objection. Speculation.

05:19:12 15 Attorney-client privilege.

05:19:16 16 THE WITNESS: I don't know. I don't remember.

05:19:18 17 MS. HAYRAPETIAN: Actually, who prepared and

05:19:21 18 when meetings happened is not privileged.

05:19:25 19 MR. HAYDEN: It invades the work-product

05:19:27 20 doctrine.

05:19:28 21 BY MS. HAYRAPETIAN:

05:19:29 22 Q Why is Mr. Roberts' profile nowhere to be

05:19:32 23 found on the UTP website? Do you know?

05:19:37 24 A Was that a question?

05:19:38 25 Q Yes.

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05:19:39 1 A What was the question?

05:19:40 2 Q Why is Mr. Roberts' profile nowhere to be

05:19:44 3 found on the UTP website?

05:19:47 4 A Why is Araya's profile nowhere to be found on

05:19:50 5 the website.

05:19:51 6 Q Who is Araya?

05:19:52 7 A Somebody else that works there too; right?

05:19:54 8 Did anybody say that everybody that works

05:20:00 9 there's profile is on the website?

05:20:08 10 Q Was Mr. Roberts on the UTP website at any

05:20:10 11 point?

05:20:11 12 A Not that I remember.

05:20:17 13 Q Do you know if Mr. Walter was ever a

05:20:21 14 licensed attorney?

05:20:22 15 A I don't remember.

05:20:24 16 Q Did you know that Mr. Walter was disbarred?

05:20:30 17 And we're looking at Exhibit 109 which is The State Bar

05:20:33 18 of California's website attorney search?

05:20:41 19 MR. HAYDEN: Objection. Relevance.

05:20:46 20 THE WITNESS: I don't remember.

05:20:46 21 (Exhibit 109 was marked for identification.)

05:20:47 22 BY MS. HAYRAPETIAN:

05:20:47 23 Q And this is the same Walter Roberts that spoke

05:20:51 24 at your UTP press conference; correct?

05:20:59 25 A I don't know who it is.

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05:21:03 1 Q Do you know if Robert Walters is authorized to  
05:21:05 2 practice law?  
05:21:10 3 A I don't remember.  
05:21:11 4 Q Has UTP ever been sued for malpractice?  
05:21:16 5 A I don't remember.  
05:21:17 6 Q Has anyone ever threatened to bring a lawsuit  
05:21:19 7 against UTP?  
05:21:20 8 A I don't remember.  
05:21:21 9 Q Has anyone ever filed a complaint against UTP  
05:21:26 10 with The State Bar of California?  
05:21:27 11 A I don't remember.  
05:21:28 12 Q Has anyone filed a non-attorney authorized  
05:21:32 13 practice of law complaint against you with The State Bar  
05:21:33 14 of California?  
05:21:36 15 A I don't remember.  
05:21:37 16 Q Has anyone filed an attorney misconduct  
05:21:39 17 complaint against any of UTP's lawyers with The State  
05:21:42 18 Bar of California?  
05:21:43 19 A I don't remember.  
05:21:44 20 Q What about any other state bars?  
05:21:46 21 A I don't remember.  
05:21:47 22 Q Has the IRS every conducted an investigation  
05:21:49 23 into UTP's tax-exempt status?  
05:21:53 24 A I don't remember.  
05:21:53 25 Q Has the California Attorney General ever

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05:21:58 1 conducted an investigation into UTP's status as a  
05:22:01 2 charitable organization?

05:22:03 3 A I don't remember.

05:22:04 4 Q There's currently an ongoing litigation  
05:22:06 5 against you and UTP for alleged sexual harassment in the  
05:22:09 6 workplace; correct?

05:22:11 7 A I don't remember.

05:22:11 8 Q It was brought by a former UTP employee;  
05:22:14 9 correct?

05:22:15 10 A I don't remember.

05:22:19 11 MS. HAYRAPETIAN: I'd like to mark as  
05:22:20 12 Exhibit 110, Tab 47.

05:22:28 13 MS. DIXON: I'm objecting as to relevance as  
05:22:30 14 well.

05:22:55 15 MS. HAYRAPETIAN: Actually, I'm going to skip  
05:22:57 16 that.

05:22:57 17 BY MS. HAYRAPETIAN:

05:22:58 18 Q Are you currently being sued for sexual  
05:23:00 19 harassment?

05:23:01 20 A I don't remember.

05:23:01 21 Q You don't remember?

05:23:03 22 MS. DIXON: Objection. Relevance.

05:23:08 23 BY MS. HAYRAPETIAN:

05:23:09 24 Q Are you being sued in a case called "Jane Doe  
05:23:11 25 versus Ceasar Charles McDowell and Unite the People,



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05:23:14 1 Case Number 25STCV18815, in the Superior Court of  
05:23:21 2 Los Angeles County"?

05:23:22 3 A I don't remember.

05:23:23 4 Q And this was filed on June 27, 2025?

05:23:27 5 A I don't remember.

05:23:27 6 Q You don't remember something that happened  
05:23:29 7 just one month ago -- less than a month ago?

05:23:32 8 A What was my answer again?

05:23:44 9 Q UTP took on Ms. Cooper's case pro bono;  
05:23:46 10 correct?

05:23:47 11 A I don't remember.

05:23:57 12 Q Did you ever publicly announce that UTP was  
05:23:59 13 taking on Ms. Cooper's case pro bono?

05:24:04 14 A I don't remember.

05:24:05 15 Q Okay. You agreed and UTP agreed not to  
05:24:28 16 receive any legal fees from Ms. Cooper; correct?

05:24:31 17 A I don't remember.

05:24:33 18 Q Did UTP and Ms. Cooper sign a contract to  
05:24:35 19 memorialize their engagement of this matter?

05:24:39 20 A I don't remember.

05:24:39 21 Q Did you have an agreement with  
05:24:45 22 Mr. Pancier -- Michael Pancier, in Florida, as local  
05:24:49 23 counsel?

05:24:51 24 A I don't remember.

05:24:51 25 Q Did you agree to still pay Mr. Pancier, even

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05:24:56 1 though you were taking on Ms. Cooper's case pro bono?

05:25:01 2 A I don't remember.

05:25:01 3 Q Did Ms. Cooper ever pay you to pay her Florida

05:25:10 4 lawyer?

05:25:10 5 A I don't remember.

05:25:12 6 Q Did local counsel, Mr. Pancier, withdraw

05:25:19 7 because he never received his attorney's fees?

05:25:22 8 MR. HAYDEN: Objection. Relevance.

05:25:23 9 Speculation.

05:25:25 10 THE WITNESS: I don't remember.

05:25:35 11 MS. HAYRAPETIAN: I'd like to mark as

05:25:36 12 Exhibit 110, Tab 25 please.

05:25:41 13 THE COURT REPORTER: 111. 111.

05:25:44 14 MS. HAYRAPETIAN: 111? No. I think I skipped

05:25:44 15 110.

05:26:11 16 (Exhibit 110 was marked for identification.)

05:26:11 17 BY MS. HAYRAPETIAN:

05:26:11 18 Q Have you ever seen this GiveSendGo page?

05:26:14 19 A What was your question?

05:26:15 20 Q Have you ever seen this GiveSendGo page?

05:26:19 21 A I don't remember.

05:26:22 22 Q Ms. Cooper raised some money through her

05:26:24 23 GiveSendGo for purposes of paying her legal fees.

05:26:26 24 Do you know how much Ms. Cooper raised on

05:26:28 25 GiveSendGo?

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05:26:30 1 A I don't know.

05:26:32 2 Q Some contributors claimed that Ms. Cooper

05:26:36 3 embezzled the money by using it for non-legal expenses.

05:26:39 4 Were you aware of that?

05:26:41 5 A I don't remember.

05:26:41 6 Q Contributors noticed that since starting her

05:26:45 7 GiveSendGo page Ms. Cooper spent a lot of -- a lot on

05:26:49 8 Lululemon clothes, DoorDash orders of hibachi, personal

05:26:54 9 trips, and electronics for her family members.

05:26:56 10 Do you recall hearing that?

05:26:58 11 A No. I don't remember.

05:27:02 12 MS. HAYRAPETIAN: I'd like to mark for the

05:27:04 13 record Exhibit 111, and if we could please look at

05:27:11 14 Tabs 51, 51-A, and 51-B.

05:27:15 15 This isn't stapled, but it's going to be one

05:27:44 16 exhibit.

05:27:50 17 (Exhibit 111 was marked for identification.)

05:28:26 18 MS. DIXON: Is there one for me?

05:28:28 19 BY MS. HAYRAPETIAN:

05:28:28 20 Q Okay. So we're looking at a tweet from an

05:28:31 21 account called "Owe Truths." [As read] And it says,

05:28:33 22 hashtag Milagro Gramz Crowdfunding Campaign she made due

05:28:38 23 to being, quote, "indigent" to retain a lawyer for a

05:28:43 24 defamation civil suit she's in, as the defendant with

05:28:46 25 Megan Thee Stallion, has been in question to spectators.

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05:28:49 1 Milagro put the amount raised in private from her donors  
05:28:52 2 she claimed the United States the People lawyer needed  
05:28:56 3 100K to even do her case. She told her followers she  
05:28:59 4 sent allegedly 15K and additional 25K.

05:29:03 5 Some spectators noticed she was out spending  
05:29:05 6 money for Lululemon, a lot of DoorDash orders of  
05:29:09 7 hibachi, taking trips to Huntsville to purchase laptops  
05:29:13 8 for her Granny that she claims has mild dementia,  
05:29:16 9 allegedly. We received -- well, I received a DM from  
05:29:21 10 someone that allegedly messaged Unite the People on  
05:29:23 11 things she said about them negatively and how much money  
05:29:28 12 she sent them, allegedly.

05:29:31 13 Do you recall receiving such a message on  
05:29:35 14 social media?

05:29:37 15 MR. HAYDEN: Objection. Relevance.

05:29:41 16 THE WITNESS: Are you talking about the United  
05:29:42 17 States the People lawyer? Who is that?

05:29:44 18 BY MS. HAYRAPETIAN:

05:29:45 19 Q I think they made a mistake, but --

05:29:46 20 A Oh, they made a mistake? Oh.

05:29:49 21 Q Do you recall receiving such a message?

05:29:51 22 A I don't remember.

05:29:52 23 Q Okay. So let's look at -- let's look at the  
05:30:00 24 next two pages which are the attachments to the tweet,  
05:30:02 25 and I'm talking about the loose-leaf pages.

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05:30:05 1 So I'm first looking at the message that says  
05:30:10 2 9:07 PM, and it looks like it's coming from UTP.  
05:30:14 3 [As read] And it says, I can't believe that is true  
05:30:18 4 because she did not give us the full 18. She sent us a  
05:30:24 5 portion of it, and that entire portion went to that  
05:30:26 6 attorney; and, of course, I have all the receipts of any  
05:30:29 7 transfers.

05:30:29 8 But, besides that, what she paid, I have  
05:30:33 9 personally paid 50, 60,000 to that attorney; so I would  
05:30:38 10 really hope that she wouldn't be bashing us. But, sure,  
05:30:41 11 you could send the audio if that is true. I would  
05:30:44 12 definitely want to hear it. I haven't had time to stop  
05:30:47 13 and assess the situation but sure.

05:30:51 14 Is that a message you sent?

05:30:53 15 A I don't remember.

05:30:54 16 Q And then, looking at the next page, it says,  
05:31:03 17 in a direct message from Unite the People, [As read] and  
05:31:10 18 I would really hope she wouldn't be bashing us because  
05:31:13 19 we have not only assigned our attorneys for free for  
05:31:16 20 pro bono for her, I personally picked up, like I said,  
05:31:20 21 at least 50-, 60,000 of my own organization's money was  
05:31:24 22 paid to that other Florida lawyer, plus she sent us a  
05:31:28 23 portion of 18. We sent the entire portion to the  
05:31:31 24 Florida lawyer, and she sent him directly the other  
05:31:34 25 portion; so we went above and beyond to help Millie.

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05:31:36 1 And I know they said there was some things  
05:31:39 2 going on with him getting off the case. Myself and my  
05:31:42 3 legal team -- we're just going through ways to find --  
05:31:45 4 to hire her another lawyer in Florida, and we were going  
05:31:48 5 to pay for it; so, if what you are saying is true, that  
05:31:52 6 would be really sad.

05:31:52 7 So, yes, if there's some audio of that, please  
05:31:56 8 send that to me; but I have to say I doubt that that's  
05:31:58 9 true, just because after all the personal struggle I  
05:32:01 10 went through to make sure this guy in Florida was  
05:32:03 11 getting paid. I'm the only one that paid personal money  
05:32:06 12 to help her. She raised money on a platform; I paid.

05:32:09 13 Was that a message you sent?

05:32:12 14 A I don't remember.

05:32:13 15 Q Do you have any reason to believe that  
05:32:27 16 Ms. Cooper used any of the money she raised on the --  
05:32:30 17 the fund for legal defense for other purposes?

05:32:35 18 A No.

05:32:35 19 Q How do you know that?

05:32:38 20 A You said, "Do I have any reason to believe."  
05:32:40 21 You didn't say, "Did I know that." I don't have a  
05:32:42 22 reason to believe that.

05:32:43 23 Q Has Ms. Cooper admitted to you that she raised  
05:32:51 24 money for her legal defense and then did not use it for  
05:32:55 25 her legal defense?

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05:32:56 1 A No.

05:32:58 2 Q Did Ms. Cooper send UTP the full amount she

05:33:00 3 raised on GiveSendGo to cover legal fees and expenses?

05:33:06 4 MS. DIXON: Objection. Calls for speculation.

05:33:10 5 THE WITNESS: I don't remember.

05:33:11 6 BY MS. HAYRAPETIAN:

05:33:11 7 Q Have you -- how much money has UTP received

05:33:15 8 from Ms. Cooper?

05:33:21 9 A I don't remember.

05:33:21 10 Q Okay.

05:33:24 11 MS. HAYRAPETIAN: Marking as Exhibit 112,

05:33:33 12 Tab 26.

05:33:37 13 Actually, I'm going to skip that.

05:33:47 14 BY MS. HAYRAPETIAN:

05:33:47 15 Q Going back to the screenshots that we just

05:33:49 16 looked at. Is it true that UTP sent at least 50,000 or

05:33:52 17 60,000 of its own funds to pay for Ms. Cooper's local

05:33:55 18 counsel?

05:33:58 19 A I don't remember.

05:33:59 20 Q Why did UTP spend this amount to support

05:34:05 21 Ms. Cooper's case?

05:34:07 22 A I just said, "I don't remember."

05:34:10 23 MR. HAYDEN: Objection. Speculation.

05:34:11 24 Relevance.

05:34:12 25 BY MS. HAYRAPETIAN:

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05:34:12 1 Q Did Tory instruct UTP to spend this money to  
05:34:15 2 support Ms. Cooper's case?

05:34:16 3 MR. HAYDEN: Same objections.

05:34:18 4 THE WITNESS: I don't remember.

05:34:19 5 BY MS. HAYRAPETIAN:

05:34:19 6 Q Are you aware Ms. Cooper has publicly accused  
05:34:23 7 of you of asking her to promote UTP to her followers and  
05:34:27 8 asked them to post good reviews for UTP to drown out the  
05:34:30 9 bad ones?

05:34:31 10 MR. HAYDEN: Objection. Speculation.

05:34:33 11 THE WITNESS: I don't remember.

05:34:33 12 BY MS. HAYRAPETIAN:

05:34:34 13 Q Earlier this week, Ms. Cooper testified during  
05:34:39 14 her deposition about a legal dispute she had with you  
05:34:42 15 and UTP. And here is some language from the rough  
05:34:47 16 deposition transcript from Monday.

05:34:49 17 The question was, "And then you said something  
05:34:52 18 about paying him back eventually. What was that? Was  
05:34:55 19 that talked about in the beginning?"

05:34:56 20 "No."

05:34:57 21 "When did that come up?"

05:34:59 22 "Answer: When Ceasar stole my money.

05:35:02 23 "Question: Tell me about that.

05:35:04 24 "Answer: The contract was for pro bono.

05:35:07 25 Representation. Ceasar came to me, and said, 'I need



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05:35:10 1 money for your lawyer, and if you don't figure out --  
05:35:14 2 figure something out, you are not going to have a lawyer  
05:35:16 3 because I can't do it.'"   
05:35:18 4 MR. HAYDEN: Objection. Speculation.  
05:35:21 5 BY MS. HAYRAPETIAN:  
05:35:21 6 Q Do you recall having such a conversation?  
05:35:24 7 A I don't recall.  
05:35:24 8 Q Are you saying Ms. Cooper lied under oath when  
05:35:37 9 she claimed to have this conversation with you?  
05:35:43 10 A I don't recall.  
05:35:43 11 Q Did you steal Ms. Cooper's legal funds?  
05:35:51 12 MR. HAYDEN: Objection. Speculation.  
05:35:52 13 Argumentative. Lacks foundation.  
05:35:56 14 THE WITNESS: No.  
05:35:57 15 BY MS. HAYRAPETIAN:  
05:35:57 16 Q Did anyone at UTP steal Ms. Cooper's legal  
05:36:02 17 funds?  
05:36:03 18 MR. HAYDEN: Same objections.  
05:36:04 19 THE WITNESS: No.  
05:36:05 20 BY MS. HAYRAPETIAN:  
05:36:05 21 Q So why is Ms. Cooper then accusing you of  
05:36:08 22 stealing her -- from her?  
05:36:10 23 MS. DIXON: Objection. Calls for speculation.  
05:36:14 24 THE WITNESS: I don't know. I can't speculate  
05:36:15 25 to that.

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05:36:17 1 MS. HAYRAPETIAN: So, Counsel, you just  
05:36:18 2 coached a witness that is not yours.

05:36:21 3 MS. DIXON: He made that statement.

05:36:22 4 MS. HAYRAPETIAN: On -- on speculative which,  
05:36:23 5 again, is not an appropriate objection, and particularly  
05:36:25 6 not in Southern District of Florida.

05:36:28 7 MS. DIXON: Actually, everything you are  
05:36:30 8 saying is a speaking objection; so --

05:36:32 9 MS. HAYRAPETIAN: And then, you are also  
05:36:33 10 misrepresenting the record where your client testified,  
05:36:37 11 under oath, quote, "When Ceasar stole my money."

05:36:41 12 MS. DIXON: I'm not mis- -- I didn't state  
05:36:41 13 anything about the record; so you are misrepresenting  
05:36:44 14 what I said. I didn't say anything about the record.

05:36:48 15 BY MS. HAYRAPETIAN:

05:36:49 16 Q So then were why would Ms. Cooper accuse you  
05:36:51 17 of stealing her money?

05:36:55 18 A I don't know.

05:36:58 19 Q UTP and Ms. Cooper had entered into a contract  
05:37:00 20 in which UTP agreed to represent her on a pro bono  
05:37:03 21 basis; correct?

05:37:05 22 A I don't remember.

05:37:11 23 Q Okay. UTP eventually withdrew from  
05:37:13 24 representing Ms. Cooper; correct?

05:37:14 25 A I don't know.

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05:37:15 1 Q Okay.

05:37:23 2 MS. HAYRAPETIAN: Let's mark Exhibit 112,

05:37:27 3 Tab 27, please.

05:37:29 4 (Exhibit 112 was marked for identification.)

05:37:50 5 BY MS. HAYRAPETIAN:

05:37:50 6 Q This is a tweet May 25, 2025, from Ms. Cooper.

05:37:54 7 It states, "Also, unfortunately, Unite the People, who

05:37:57 8 publicly asserted that they would take on my case of no

05:38:00 9 cost to me, doesn't have the resources to challenge the

05:38:03 10 machine. They withdrew, as the Florida lawyer did, for

05:38:06 11 this same reason."

05:38:11 12 Do you recall withdrawing -- do you recall

05:38:15 13 when UTP withdrew from Ms. Cooper's representation now?

05:38:20 14 A I don't remember.

05:38:21 15 Q Financial hardship was not the reason UTP

05:38:26 16 withdrew; correct?

05:38:29 17 MR. HAYDEN: Objection. Speculation.

05:38:31 18 THE WITNESS: I don't remember.

05:38:43 19 MS. HAYRAPETIAN: I'd like to mark

05:38:44 20 Exhibit 113, and if we could please pull up Tab 28-A.

05:38:54 21 And then the corresponding transcript will be 113-B.

05:40:24 22 (Exhibit 113-A was marked for identification.)

05:40:24 23 (Exhibit 113-B was marked for identification.)

05:40:24 24 (A video clip was played.)

05:40:25 25 BY MS. HAYRAPETIAN:

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05:40:26 1 Q Okay. So, in May 2025, as her lawyers are  
05:40:57 2 withdrawing from this case and representing her,  
05:41:01 3 Ms. Cooper goes on live stream, and she is saying she's  
05:41:07 4 never going to help Tory again.

05:41:10 5 What was she helping --

05:41:13 6 MS. DIXON: Objection. It misstates what the  
05:41:14 7 evidence is showing.

05:41:15 8 MS. HAYRAPETIAN: Okay. Well, we just  
05:41:16 9 listened to the transcript.

05:41:17 10 MS. DIXON: It didn't say that.

05:41:18 11 MS. HAYRAPETIAN: And the language is there.

05:41:19 12 MS. DIXON: Okay. Well, just go on the  
05:41:21 13 language that's there then.

05:41:22 14 BY MS. HAYRAPETIAN:

05:41:23 15 Q So what was Ms. Cooper helping Tory with?

05:41:29 16 MR. HAYDEN: Objection. Speculation. Assumes  
05:41:31 17 facts not in evidence.

05:41:36 18 THE WITNESS: The audio and the paper you just  
05:41:38 19 handed me don't say one word about Tory. I don't see  
05:41:42 20 Tory nowhere in there. So I don't know what you are  
05:41:44 21 talking about. I think you must be asking me about  
05:41:48 22 something you didn't hand me.

05:41:49 23 Can you hand me the paper that says "Tory"  
05:41:51 24 please?

05:41:51 25 BY MS. HAYRAPETIAN:

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05:41:52 1 Q So it's in the first box. And if you look at  
05:41:54 2 the first box, the third line from the bottom in the  
05:41:56 3 first box.

05:41:58 4 A That says put God -- I'm talking about where  
05:42:00 5 she said -- you said she said she would never ride for  
05:42:05 6 Tory or whatever again. She didn't say anything about  
05:42:07 7 Tory -- not one word about Tory. Down at the bottom,  
05:42:10 8 she says she feels like God put Tory in her life or  
05:42:14 9 whatever; so I don't know what you're talking about.

05:42:14 10 If you want to hand me the one that says that  
05:42:16 11 she ain't never going to fucking ride for Tory -- or I  
05:42:19 12 don't know if you're -- are you using his name in  
05:42:21 13 replacing the word "nigga"? Are you insinuating that  
05:42:24 14 Tory is a nigga? That's what it sounds like to me.

05:42:30 15 Q Okay. Are you going to answer my question?

05:42:35 16 A I just did.

05:42:37 17 Q That's your answer to my question?

05:42:39 18 A You want to ask your question again?

05:42:41 19 Q You've wasted enough of everyone's time today.

05:42:45 20 A I think you have.

05:42:49 21 Q UTP has a board of directors; correct?

05:42:56 22 A I don't recall.

05:42:57 23 Q As the CEO of UTP, you don't know whether UTP  
05:43:01 24 has a board of directors?

05:43:03 25 A I don't recall.

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05:43:04 1 Q What role does the board play in UTP's  
05:43:06 2 operations and management?  
05:43:08 3 A I don't recall.  
05:43:09 4 Q Who are the current board members?  
05:43:11 5 A I don't recall.  
05:43:12 6 Q Is your brother Mitch McDowell a board member?  
05:43:15 7 A I don't recall.  
05:43:16 8 Q Is Tni Jackson a board member?  
05:43:21 9 A I don't recall.  
05:43:21 10 Q How are board members selected?  
05:43:23 11 A I don't recall.  
05:43:25 12 Q Are UTP board members financially compensated  
05:43:28 13 for holding these positions?  
05:43:30 14 A I don't recall.  
05:43:30 15 Q Why are you not a board member?  
05:43:32 16 A I don't recall.  
05:43:33 17 Q Is your tenure as CEO subject to boards'  
05:43:36 18 approval?  
05:43:37 19 A I don't recall.  
05:43:38 20 Q UTP has advisory members; correct?  
05:43:41 21 A I don't recall.  
05:43:41 22 Q You are one of these advisory members?  
05:43:45 23 A I don't recall.  
05:43:49 24 Q What role do you -- what role does advisory  
05:43:51 25 members play?

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05:43:52 1 A I don't recall.

05:43:58 2 MS. HAYRAPETIAN: Okay. Let's mark for the

05:44:00 3 record Tab 14 which is -- sorry -- Exhibit 114 which is

05:44:02 4 Tab 49.

05:44:03 5 (Exhibit 114 was marked for identification.)

05:44:26 6 BY MS. HAYRAPETIAN:

05:44:26 7 Q Okay. This is a printout from UTP's website.

05:44:28 8 Title says, "Advisory Members." Number 1,

05:44:31 9 Ceasar McDowell; number 2, Mitch McDowell; number 3,

05:44:34 10 Danielle Frost; number 4, Mari Ronquillo; 5, Tory Lanez,

05:44:45 11 6; Todd Perry II; 7, Tni Jackson.

05:44:49 12 Do you see that?

05:45:00 13 A I see that on the paper.

05:45:02 14 Q Okay. So do you recall whether you are an

05:45:09 15 advisory member of Unite the People?

05:45:13 16 A I don't recall.

05:45:14 17 Q Okay. Mari Ronquillo is also an advisory

05:45:21 18 member; right?

05:45:22 19 A I don't recall.

05:45:23 20 Q Okay. Well, we just looked at this exhibit,

05:45:24 21 and on page 3 of this exhibit, it states that

05:45:30 22 Mari Ronquillo is a advisory member at your organization

05:45:36 23 Unite the People, which you are both a co-founder and

05:45:39 24 CEO; correct?

05:45:41 25 A That's what you said.

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05:45:42 1 Q Okay. So how did Ms. Ronquillo become an  
05:45:46 2 advisory member?  
05:45:47 3 A I don't recall.  
05:45:48 4 Q Since when is Ms. Ronquillo been an advisory  
05:45:50 5 member?  
05:45:51 6 A I don't recall.  
05:45:52 7 Q What role does Ms. Ronquillo play as an  
05:45:54 8 advisory member?  
05:45:56 9 A I don't know.  
05:45:56 10 Q Is Ms. Ronquillo compensated as an advisory  
05:46:00 11 member?  
05:46:01 12 A I don't know.  
05:46:01 13 Q Ms. Ronquillo is the founder of Lyme Lite  
05:46:03 14 Media and Public Relations; correct?  
05:46:05 15 A I don't know. You'd have to ask her.  
05:46:07 16 Q So let's go to page 4. And this is the bio of  
05:46:20 17 Ms. Ronquillo on your website, the company where you are  
05:46:25 18 a CEO and advisory member and a co-founder. And it says  
05:46:29 19 from there, Lyme Lite Media became the public --  
05:46:33 20 publicity team for countless top-trending superstars,  
05:46:36 21 and it's talking about Ms. Ronquillo's involvement in  
05:46:41 22 the organization. And it says, on page 3, "It is no  
05:46:47 23 mystery why that Lyme Lite Media, run by Mari Ronquillo,  
05:46:52 24 is one of the first word-of-mouth, sought-after boutique  
05:46:56 25 public relations firms recommended."



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05:46:58 1 Do you see that? On your website?

05:47:09 2 A I see it on this paper.

05:47:11 3 Q Lyme Lite helps artists and entertainers with

05:47:16 4 their public relations; correct?

05:47:17 5 A I don't know.

05:47:18 6 Q Ms. Ronquillo advises UTP on its press

05:47:21 7 releases and conferences; correct?

05:47:23 8 A I don't know.

05:47:24 9 Q Does Ms. Ronquillo assist you with drafting

05:47:27 10 social media posts on UTP's account?

05:47:29 11 A I don't know.

05:47:30 12 Q Are you aware the Lyme Lite previously reached

05:47:32 13 out to Ms. Cooper before the start of this litigation?

05:47:36 14 A I don't know.

05:47:40 15 MS. HAYRAPETIAN: I'd like to introduce and

05:47:43 16 mark for the record Exhibit 115.

05:48:06 17 (Exhibit 115 was marked for identification.)

05:48:06 18 BY MS. HAYRAPETIAN:

05:48:06 19 Q And this is a text compilation produced by

05:48:09 20 Ms. Cooper, Bates number DEFMG000219. And we're looking

05:48:13 21 at the very first text on the left-hand side, the very

05:48:16 22 first screenshot on the left-hand side top-corner.

05:48:22 23 Milagro texting Sonstar. And she states,

05:48:24 24 "Hey, I was contacted by Mari, and I just wanted to

05:48:28 25 confirm that it was her before saying or sending

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05:48:31 1 anything. Her last four are 0824, and the email address  
05:48:35 2 provided is mari@lymelitemedia.com. Thank you so much."

05:48:39 3 And December 7, 2022, was just a few days  
05:48:48 4 before Tory's criminal trial commenced for the shooting,  
05:48:54 5 which is when this text message is dated.

05:48:56 6 Do you see that?

05:49:00 7 A I see it.

05:49:01 8 Q Okay. So Sonstar appears to have shared  
05:49:03 9 Ms. Cooper's contact details with your advisory board  
05:49:06 10 member Ms. Ronquillo; right?

05:49:08 11 A I don't see that.

05:49:10 12 Q Okay. Well, your client, Ms. Cooper, is  
05:49:13 13 telling Tory's father that she was contacted by Mari,  
05:49:18 14 and he -- she is checking with Sonstar to make sure that  
05:49:23 15 that's the correct person. And that person happens to  
05:49:26 16 be an advisory board member at your company; correct?

05:49:29 17 A I don't know.

05:49:32 18 Q Okay. Do you know how Sonstar knows  
05:49:35 19 Ms. Ronquillo?

05:49:36 20 A I don't know.

05:49:37 21 Q Are you the one who introduced Sonstar to  
05:49:38 22 Ms. Ronquillo, your advisory board member?

05:49:42 23 A No.

05:49:45 24 Q Did Ms. Ronquillo to reach out to Ms. Cooper  
05:49:48 25 per your directive?

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05:49:51 1 A No.

05:49:52 2 Q Was it per Tory's directive?

05:49:55 3 MR. HAYDEN: Objection. Speculation.

05:49:56 4 THE WITNESS: I wouldn't know.

05:49:58 5 BY MS. HAYRAPETIAN:

05:49:58 6 Q Does Sonstar have a role at UTP?

05:50:06 7 A I don't know.

05:50:07 8 Q Has Sonstar ever donated financially to UTP?

05:50:13 9 A I don't know.

05:50:13 10 Q Has Sonstar ever participated in UTP meetings?

05:50:20 11 A I don't know.

05:50:26 12 Q Do you have a salary as CEO of UTP?

05:50:28 13 A I don't know.

05:50:28 14 Q You don't know if you get paid from UTP?

05:50:31 15 A You didn't ask me, do I get paid. You asked,

05:50:33 16 do I have a salary.

05:50:35 17 Q Do you get paid by UTP?

05:50:36 18 A Yes.

05:50:38 19 Q How -- what -- what's the arrangement?

05:50:40 20 A I don't know.

05:50:41 21 Q You don't know how much money you make from

05:50:42 22 UTP?

05:50:43 23 A Nope.

05:50:44 24 Q Is it on a monthly basis?

05:50:47 25 A I don't know.

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05:50:48 1 Q Bi-weekly basis?

05:50:50 2 A I don't know.

05:50:51 3 Q Are you paid annually?

05:50:53 4 A I don't know.

05:50:54 5 Q Are you paid quarterly?

05:50:55 6 A I don't know.

05:50:56 7 Q Do you get bonuses?

05:50:57 8 A I don't know.

05:50:58 9 MR. HAYDEN: Objection. Relevance.

05:51:00 10 BY MS. HAYRAPETIAN:

05:51:00 11 Q How do you make income to make a living?

05:51:08 12 A I work hard, massa.

05:51:11 13 (The Court Reporter requested clarification.)

05:51:11 14 THE WITNESS: I work hard, massa. M-A-S-S-A.

05:51:16 15 Massa.

05:51:16 16 BY MS. HAYRAPETIAN:

05:51:16 17 Q What's that? What's master?

05:51:20 18 A I said, "massa."

05:51:22 19 Q Okay. What's massa?

05:51:24 20 A I don't know.

05:51:30 21 Q So how do you make money to live?

05:51:33 22 A I work hard.

05:51:35 23 Q Okay. Where do you derive your income from?

05:51:39 24 A I don't know.

05:51:40 25 Q Have you ever been paid in cash by anyone from

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05:51:45 1 UTP?

05:51:48 2 A I don't know.

05:51:49 3 Q Do you have any income sources besides UTP?

05:51:52 4 A I don't know.

05:51:54 5 Q Do you have bank accounts separate from UTP?

05:51:57 6 A I don't know.

05:51:58 7 Q After your press conference, Drake promoted

05:52:01 8 Tory's petition; correct?

05:52:02 9 A Who.

05:52:03 10 Q Drake?

05:52:03 11 A Who is that?

05:52:04 12 Q Aubrey Graham?

05:52:06 13 A I don't know who that is.

05:52:07 14 Q You don't know who Drake is?

05:52:08 15 A Drake?

05:52:09 16 Q Yes. The music artist.

05:52:11 17 A Oh. The rapper guy?

05:52:15 18 Q Correct.

05:52:15 19 A Uh-huh. He is good.

05:52:17 20 Q So, after your press conference about Tory and

05:52:23 21 the stabbing, Gianno Caldwell put a petition for people

05:52:27 22 to sign to petition the governor to pardon Tory;

05:52:29 23 correct?

05:52:33 24 A I don't know. You have to ask Gianno.

05:52:34 25 Q Okay. Did you ever promote or sign a petition

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05:52:36 1 on behalf of Tory Lanez for the governor to pardon him?

05:52:41 2 A I don't recall.

05:52:42 3 Q How did Drake become aware of that petition?

05:52:48 4 MS. DIXON: Objection. Calls for speculation.

05:52:50 5 And relevance.

05:52:53 6 BY MS. HAYRAPETIAN:

05:52:54 7 Q Sir?

05:52:55 8 A Huh?

05:52:55 9 Q Can you answer my question.

05:52:57 10 A How did who?

05:52:58 11 Q How did Drake become aware of that petition?

05:53:03 12 A How could I possibly know?

05:53:05 13 Q Did anyone from UTP communicate with Drake's  
05:53:08 14 team?

05:53:08 15 MR. HAYDEN: Objection. Speculation.

05:53:11 16 THE WITNESS: And relevance.

05:53:11 17 I don't know. Who did what?

05:53:16 18 BY MS. HAYRAPETIAN:

05:53:16 19 Q Did anyone from your organization, UTP,  
05:53:19 20 communicate with Drake's team about this petition?

05:53:22 21 A I love Drake. Man, I wish I could talk to  
05:53:26 22 Drake. I don't know Drake.

05:53:28 23 Q Okay. Do you know anyone in Drake's team?

05:53:36 24 A No.

05:53:36 25 Q After Drake posted about the petition, did

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05:53:39 1 other celebrities follow?

05:53:43 2 A I don't know.

05:53:44 3 Q Do you coordinate messaging with celebrity  
05:53:47 4 representatives?

05:53:48 5 A Who?

05:53:49 6 Q Celebrity representatives?

05:53:50 7 A Representatives of who?

05:53:53 8 Q Celebrities.

05:53:54 9 A Celebrities that represent celebrities. I  
05:53:56 10 don't know that.

05:53:57 11 Q Okay. Do you know Adin Ross?

05:54:00 12 A Who?

05:54:00 13 Q Adin Ross?

05:54:02 14 A He is a rapper?

05:54:05 15 Q Do you know someone named Adin Ross?

05:54:10 16 A I don't even know who that is.

05:54:12 17 Q You wanted to connect with DJ Akademiks  
05:54:20 18 through Ms. Cooper; correct?

05:54:22 19 MR. HAYDEN: Objection. Speculation.

05:54:23 20 THE WITNESS: I don't remember.

05:54:23 21 BY MS. HAYRAPETIAN:

05:54:24 22 Q Did you ever speak with DJ Akademiks directly?

05:54:28 23 A I don't remember.

05:54:29 24 Q Has DJ Akademiks paid you for coordination of  
05:54:32 25 content?

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05:54:33 1 MR. HAYDEN: Objection. Speculation.

05:54:35 2 THE WITNESS: Nobody paid me for nothing.

05:54:37 3 BY MS. HAYRAPETIAN:

05:54:37 4 Q Do you know who Kelsey Harris is?

05:54:39 5 MR. HAYDEN: Objection. Relevance.

05:54:42 6 THE WITNESS: I don't know her.

05:54:42 7 BY MS. HAYRAPETIAN:

05:54:44 8 Q You were at Tory's trial; right?

05:54:47 9 A Some days.

05:54:48 10 Q Okay. And you also worked on Tory's case with

05:54:53 11 regards to the shooting; right?

05:54:55 12 A No.

05:54:57 13 Q UTP handled parts of Tory's case; correct?

05:55:02 14 A No.

05:55:03 15 Q Okay. So how is Tory UTP's client?

05:55:07 16 A Well, you -- you have to, again, understand

05:55:10 17 post-conviction. If you don't understand, you just keep

05:55:12 18 running around in a circle.

05:55:13 19 Unite the People did not have anything to do

05:55:15 20 with Tory's criminal case.

05:55:17 21 Q Okay. What did you have to do with then?

05:55:19 22 A Post-conviction.

05:55:20 23 Q Okay. And --

05:55:21 24 A That's after the case.

05:55:22 25 Q -- how does the process work?



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05:55:24 1 A So we didn't represent him during the case;  
05:55:26 2 that's after the case.

05:55:27 3 Q Okay. So after the case, you represented him;  
05:55:29 4 correct?

05:55:29 5 A Yes.

05:55:30 6 Q And what did your representation entail at  
05:55:32 7 that point? I don't do post-conviction. I don't do  
05:55:37 8 that work --

05:55:38 9 A Then I don't know.

05:55:38 10 Q -- so I'm asking you.

05:55:40 11 A I don't know either. You'll have to ask your  
05:55:40 12 lawyers.

05:55:42 13 MR. HAYDEN: Objection. Calls for a  
05:55:43 14 narrative.

05:55:45 15 BY MS. HAYRAPETIAN:

05:55:46 16 Q So you have some familiarity with the facts of  
05:55:48 17 his case?

05:55:50 18 A Not too much.

05:55:52 19 Q And you know that Kelsey Harris was in the car  
05:55:54 20 with Tory and Megan at the time of the shooting?

05:55:57 21 A Who is Kelsey Harris?

05:55:59 22 Q I'm asking, are you aware that Kelsey Harris  
05:56:03 23 was in the car?

05:56:05 24 A I'm asking you, who is Kelsey Harris?

05:56:07 25 Q Okay. So Kelsey Harris, as you would know,

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05:56:11 1 since you are working on Tory's post-conviction matter,  
05:56:16 2 was one of the people at the scene of the crime. And  
05:56:22 3 she was allegedly sleeping with Tory at the time;  
05:56:24 4 correct?

05:56:26 5 A I don't know. You'd have to ask them.

05:56:28 6 MR. HAYDEN: Objection. Speculation.

05:56:28 7 Relevance.

05:56:29 8 BY MS. HAYRAPETIAN:

05:56:30 9 Q Okay. Kelsey originally identified Tory as  
05:56:33 10 the shooter in police interviews; correct?

05:56:35 11 A I don't know. You got to ask Kelsey.

05:56:37 12 Q But at trial --

05:56:38 13 MS. DIXON: Objection. That misstates the  
05:56:39 14 evidence, actually.

05:56:40 15 BY MS. HAYRAPETIAN:

05:56:41 16 Q -- she flipped and pleaded the Fifth; correct?

05:56:45 17 A I don't know. You got to ask her.

05:56:51 18 Q Do you know what 1501 Entertainment is?

05:56:55 19 A The strip club?

05:56:58 20 Q The record label.

05:56:59 21 A No. I have never heard of it.

05:57:01 22 Q Do you know Jay Prince?

05:57:15 23 A Jay Prince, the guy from Chicago? Is that who  
05:57:19 24 we're talking about?

05:57:20 25 Q Have you ever been paid by Jay Prince or

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05:57:22 1 anyone connected to him?

05:57:24 2 A Wow. No.

05:57:27 3 Q After Drake promoted Tory's petition, did  
05:57:30 4 Jay Prince contact -- Jay Prince's people contact you?

05:57:34 5 A No.

05:57:36 6 Q Have you received instructions from  
05:57:37 7 Jay Prince's organization?

05:57:42 8 A No.

05:57:43 9 Q Have you received funding from music industry  
05:57:52 10 sources?

05:57:54 11 A No.

05:57:55 12 Q Are there payments to you personally that  
05:58:00 13 don't go through UTP?

05:58:02 14 A No.

05:58:02 15 Q Have you received payments you were told to  
05:58:05 16 keep confidential?

05:58:08 17 A No.

05:58:11 18 Q Okay. Your website states that "UTP is a 501c  
05:58:18 19 non-profit organization"; right?

05:58:19 20 A No.

05:58:20 21 Q It is not?

05:58:20 22 A 501(c)3.

05:58:23 23 Q Okay. 501(c)3.

05:58:26 24 A Yes, ma'am.

05:58:26 25 Q Okay. When did UTP obtain 501(c)3 status?

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05:58:31 1 A I don't remember.

05:58:36 2 MS. HAYRAPETIAN: Let's take a look at

05:58:39 3 Exhibit 116.

05:58:51 4 (Exhibit 116 was marked for identification.)

05:59:15 5 BY MS. HAYRAPETIAN:

05:59:15 6 Q Okay. On the top of page 2 -- well, I'll just

05:59:19 7 represent that this is a 2021 IRS filing Form 990 of

05:59:25 8 Unite the People, which you can see on the very first

05:59:27 9 page, from the top of the page. And on the top of

05:59:32 10 page 2 of UTP's publicly available tax returns, it says

05:59:35 11 that UTP filed its 2021 IRS forms on January 19, 2024.

05:59:42 12 Do you see that?

05:59:45 13 A January 19. Yep. That's what it says.

05:59:48 14 Q Okay. And do you know if that's considered

05:59:50 15 timely?

05:59:52 16 A I don't know. I don't do taxes.

05:59:53 17 Do you?

05:59:54 18 Q Do you know why UTP is filing its federal tax

05:59:57 19 forms after the deadline?

05:59:59 20 A I don't know.

06:00:00 21 MR. HAYDEN: Objection. Relevance.

06:00:01 22 MS. DIXON: Objection. Relevance.

06:00:03 23 BY MS. HAYRAPETIAN:

06:00:03 24 Q Who handles the tax filings at -- of UTP?

06:00:11 25 A Probably that somebody that does taxes.

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06:00:14 1 Q Okay. As the CEO, you do not know -- are  
06:00:15 2 you -- is your testimony today that you do not know who  
06:00:17 3 handles the financials and taxes of your organization?  
06:00:22 4 A My testimony is the person that does the taxes  
06:00:25 5 is probably a tax person.  
06:00:27 6 Q So where would you go to find out if a judge  
06:00:31 7 was asking you this question?  
06:00:33 8 A I don't know. Tell the judge to ask me.  
06:00:35 9 Q Has UTP missed any of its annual tax filings?  
06:00:46 10 A I don't know.  
06:00:47 11 Q Does UTP still have 5013c [as heard] status?  
06:00:52 12 A Yes.  
06:00:53 13 Q Has UTP ever lost its 501(c)3 status?  
06:00:59 14 A No.  
06:00:59 15 Q Okay.  
06:01:12 16 MS. HAYRAPETIAN: I'm marking for the record  
06:01:14 17 Tab 1, and it's Exhibit 117.  
06:01:45 18 MS. DIXON: I don't -- what is the tax return  
06:02:00 19 exhibit number? Was it 116?  
06:02:09 20 (Exhibit 117 was marked for identification.)  
06:02:09 21 BY MS. HAYRAPETIAN:  
06:02:09 22 Q So have you seen the document in front of you?  
06:02:12 23 A No.  
06:02:12 24 Q Okay. This is your deposition subpoena, and  
06:02:14 25 you've never seen it before?

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06:02:16 1 A Not at all.

06:02:21 2 Q Did you meet with your lawyer before you came

06:02:22 3 to this deposition?

06:02:23 4 A No.

06:02:24 5 Q Your lawyer did not show you this deposition

06:02:27 6 notice?

06:02:29 7 A I don't recall.

06:02:29 8 Q How did you know to come to your deposition

06:02:32 9 today?

06:02:37 10 A I was told there was a deposition today.

06:02:38 11 Q Okay. Were you provided a copy of that

06:02:43 12 document at any point?

06:02:44 13 A I don't recall.

06:02:46 14 Q Did you receive a list of documents you were

06:02:48 15 supposed to search for to bring to your deposition?

06:02:52 16 A I don't recall.

06:02:54 17 Q Okay. Let's go to page -- it's towards the

06:03:04 18 end. It's going to be page 7.

06:03:11 19 So the first request requires you to produce

06:03:14 20 all documents and communications between you and

06:03:17 21 defendant that refer or relate to Ms. Pete.

06:03:19 22 Did you bring any documents today responsive

06:03:24 23 to this request?

06:03:27 24 A What page are we on?

06:03:29 25 Q We're on page 7.

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06:03:30 1 A Let me get there. Let me see.

06:03:32 2 Did I bring any of these documents?

06:03:56 3 Q Yes.

06:03:56 4 A No.

06:03:57 5 Q Did you search for any of these documents?

06:04:03 6 A I don't remember.

06:04:05 7 MS. DIXON: I would object to the extent that

06:04:06 8 they're work product, attorney-client privilege.

06:04:09 9 MS. HAYRAPETIAN: Okay. Thanks.

06:04:10 10 BY MS. HAYRAPETIAN:

06:04:11 11 Q Are you saying you did not look for any of the

06:04:15 12 documents requested here?

06:04:17 13 A I didn't say that. I said, "I don't

06:04:18 14 remember."

06:04:19 15 Q You don't remember. Okay.

06:04:20 16 Do you remember what you did to look for the

06:04:22 17 documents here?

06:04:24 18 A Again, I don't remember.

06:04:26 19 Q What devices did you search?

06:04:32 20 A Are you talking to me again?

06:04:33 21 Q Yes.

06:04:34 22 A I don't remember.

06:04:34 23 Q How many cell phones do you have?

06:04:37 24 A When you say "cell phones," do you mean mobile

06:04:41 25 phones? What type of cell phones?

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06:04:43 1 Q What kind of cell phones are you aware of that  
06:04:45 2 exist?

06:04:48 3 A Satellite phones. Is that a cell phone? They  
06:04:53 4 have those rapid radios now. Those are good.

06:04:57 5 Q Okay. Do you use either of those things to  
06:05:00 6 text and communicate with the defendant?

06:05:05 7 A Who is the defendant?

06:05:07 8 Q Milagro Cooper, your former client.

06:05:11 9 A I don't know.

06:05:12 10 Q Okay. Did you search your mobile device for  
06:05:14 11 communications with Ms. Cooper?

06:05:16 12 A I don't remember.

06:05:18 13 Q Did you check your personal emails for  
06:05:23 14 communications with Ms. Cooper?

06:05:25 15 A I don't remember.

06:05:26 16 Q Did you check your social media accounts for  
06:05:33 17 communications with Ms. Cooper?

06:05:35 18 A I don't remember.

06:05:36 19 Q Did you check your banking apps for financial  
06:05:42 20 transfers with or regarding Ms. Cooper?

06:05:50 21 A Financial apps for -- I don't even know what  
06:05:52 22 you are talking about.

06:05:53 23 Q Did you look at your bank accounts to see if  
06:05:55 24 there were any money transfers to or from Ms. Cooper?

06:06:01 25 A No. I don't remember.



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06:06:03 1 Q No or you don't remember?

06:06:05 2 A I said, "No, I don't remember."

06:06:07 3 Q Okay. So we have -- I'm just going to try to

06:06:12 4 streamline. We have seven requests. We went through

06:06:14 5 the first one. And you did not search for documents;

06:06:17 6 right?

06:06:18 7 A I said, "I don't remember."

06:06:19 8 Q Okay. All documents and communications

06:06:22 9 between you and Sonstar Peterson that refer or relate to

06:06:25 10 defendant.

06:06:25 11 Did you search for documents?

06:06:28 12 A Again, I said, "I don't remember."

06:06:30 13 Q All documents and communications between you

06:06:32 14 and Daystar Peterson that refer or relate to defendant.

06:06:35 15 Did you search for those documents and

06:06:37 16 communications?

06:06:38 17 A Again, I don't remember.

06:06:41 18 Q All documents and communications that refer or

06:06:43 19 relate to any payments and/or items of value given to

06:06:47 20 defendant.

06:06:47 21 Did you search for those documents and

06:06:50 22 communications?

06:06:51 23 A Again, I don't remember.

06:06:52 24 Q All documents and communications that refer or

06:06:54 25 relate to any payments and/or items of value given to

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06:06:58 1 defendant's family.

06:06:59 2 Did you search for --

06:07:01 3 A Again, I do not remember.

06:07:03 4 Q My question was not done. But did you search

06:07:05 5 for documents responsive to that request?

06:07:06 6 Let me guess, you don't remember.

06:07:11 7 MR. HAYDEN: Objection. Argumentative.

06:07:13 8 MS. HAYRAPETIAN: Let's take a 10-minute

06:07:14 9 break.

06:07:16 10 THE VIDEOGRAPHER: The time is 6:07 PM.

06:07:18 11 Pacific time. We are now off the record.

06:07:30 12 (Recess was taken.)

06:35:04 13 THE VIDEOGRAPHER: The time is 6:35 PM

06:35:14 14 Pacific time. We are back on the record.

06:35:15 15 BY MS. HAYRAPETIAN:

06:35:17 16 Q Before I do my final admonitions, I should

06:35:19 17 ask, does anyone have questions they want to ask the

06:35:22 18 witness?

06:35:26 19 MR. HAYDEN: I don't have any.

06:35:27 20 MS. DIXON: I don't have any.

06:35:29 21 MS. HAYRAPETIAN: Okay.

06:35:29 22 BY MS. HAYRAPETIAN:

06:35:30 23 Q Mr. McDowell, in a week or so you will be

06:35:32 24 given the transcript to review to make sure that it

06:35:35 25 accurately reflects what you said here today. Your

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06:35:38 1 attorney will provide that to you, and it will also  
06:35:40 2 include the exhibits. You can make any changes that you  
06:35:44 3 think are necessary to ensure that the transcript  
06:35:47 4 accurately reflects what you say here today -- what you  
06:35:49 5 said here today. There will be a corrections form at  
06:35:52 6 the end of the transcript where you can fill out any  
06:35:55 7 such changes.

06:35:55 8 If you make any substantive changes to your  
06:35:58 9 testimony, such as changing a "Yes" to a "No," or by  
06:36:01 10 writing in additional words or sentences, anyone can  
06:36:04 11 comment on that to the judge or jury, as indicating that  
06:36:07 12 you are not a credible witness.

06:36:09 13 Do you understand?

06:36:10 14 A Yes.

06:36:11 15 Q Anyone can ask the judge or jury to disregard  
06:36:15 16 any substantive changes you made to the transcript and  
06:36:17 17 rely solely on what the transcript said before you  
06:36:21 18 received it.

06:36:21 19 Do you understand?

06:36:23 20 A Yes.

06:36:24 21 Q And, as a reminder, given your company  
06:36:26 22 previously represented Ms. Cooper, you are -- everyone  
06:36:31 23 at your company is still bound by the protective order  
06:36:34 24 that is entered in this case, and all the documents and  
06:36:39 25 conversations we had today are so protected under that

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06:36:45 1 protective order.

06:36:46 2 Do you understand?

06:36:48 3 A No.

06:36:49 4 Q What don't you understand?

06:36:51 5 A What you just said.

06:36:52 6 Q Okay. So we can -- I can show it to you.

06:37:01 7 MS. HAYRAPETIAN: Let's add this as an

06:37:03 8 exhibit. It's 118.

06:37:18 9 (Exhibit 118 was marked for identification.)

06:37:29 10 BY MS. HAYRAPETIAN:

06:37:29 11 Q I will represent that it is an order signed by

06:37:33 12 the judge in this case after the parties --

06:37:37 13 specifically, Mr. Hayden, and Mr. Pancier, and our

06:37:44 14 firm -- negotiated which is just a standard protective

06:37:48 15 order, and the parties have been bound by this

06:37:54 16 protective order. And I was merely explaining that

06:38:00 17 given your firm previously represented Ms. Cooper, your

06:38:06 18 company continues to be bound by its language.

06:38:09 19 Do you understand that?

06:38:12 20 A Is the company that leaked the audio to the

06:38:15 21 media -- are they in here? Are they bound to this too?

06:38:17 22 Or no, just us?

06:38:19 23 MS. HAYRAPETIAN: I have no idea what you're

06:38:20 24 talking about.

06:38:20 25 MR. HAYDEN: This just pertains to us.

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06:38:22 1 THE WITNESS: Oh, okay.

06:38:23 2 BY MS. HAYRAPETIAN:

06:38:24 3 Q And that while my questioning for today has  
06:38:30 4 concluded, I have to keep the deposition open, given  
06:38:34 5 from the very beginning of my very first question, the  
06:38:39 6 witness had made clear he was not going to cooperate  
06:38:42 7 today and said it would not go well; and that he  
06:38:47 8 indicated in every way, including with his words, that  
06:38:50 9 he had no intention of providing substantive and  
06:38:53 10 truthful responses; and I think the transcript reflects  
06:38:58 11 that today with the hundreds of "I don't knows" and "I  
06:39:00 12 don't remembers."

06:39:01 13 And even, after the very first question, when  
06:39:06 14 I asked for other names, I was refused a response; and  
06:39:12 15 it was only after I stepped out to consider calling the  
06:39:15 16 judge and came back, that my questions began to get some  
06:39:23 17 words, although they were not substantive responses.

06:39:27 18 And throughout the entire depo, I believe the  
06:39:31 19 witness was generally rude, disrespectful, and did  
06:39:37 20 everything to undermine the discovery and obstruct  
06:39:41 21 this -- this deposition. And I reserve plaintiff's  
06:39:46 22 right to seek relief from the court and come back, if we  
06:39:50 23 need to.

06:39:50 24 And, with that, thank you for your time,  
06:39:55 25 Mr. McDowell.

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06:39:57 1 THE VIDEOGRAPHER: If there's nothing further,  
06:39:59 2 before going off the record, Counsel Dixon, transcript  
06:40:02 3 or video order for you, ma'am?  
06:40:04 4 MS. DIXON: No. No, thank you.  
06:40:06 5 MR. HAYDEN: Okay.  
06:40:06 6 THE VIDEOGRAPHER: Counsel Hayden, transcript  
06:40:07 7 or video order for you, sir?  
06:40:09 8 MR. HAYDEN: Yes. The witness is requesting  
06:40:11 9 one for us, yes.  
06:40:14 10 THE VIDEOGRAPHER: But no video, sir?  
06:40:16 11 MR. HAYDEN: No video order.  
06:40:16 12 THE VIDEOGRAPHER: And, Counsel Hayrapetian,  
06:40:18 13 would you like the video synced with the transcript?  
06:40:20 14 THE WITNESS: I want the video.  
06:40:21 15 MR. HAYDEN: You want the video?  
06:40:21 16 I take that back. He wants the video as well.  
06:40:24 17 THE VIDEOGRAPHER: Would you like the video  
06:40:25 18 synced with the transcript?  
06:40:27 19 MR. HAYDEN: Yes, that would be good.  
06:40:28 20 THE VIDEOGRAPHER: And, Counsel Hayrapetian,  
06:40:30 21 would you like the video synced with the transcript?  
06:40:33 22 MS. HAYRAPETIAN: Yes, please. And I would  
06:40:34 23 like a rough as well.  
06:40:35 24 THE VIDEOGRAPHER: Okay. That ends Volume I  
06:40:37 25 of the video deposition of Ceasar McDowell. The time is

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06:40:42 1 6:40 PM Pacific time. We are now off the record.

06:40:44 2 (Proceedings concluded at 6:40 PM.)

06:40:55 3 - - -

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DECLARATION UNDER PENALTY OF PERJURY

I, the undersigned, declare under penalty of perjury that I have read the entire foregoing transcript of my deposition or the same has been read to me, and the same is true and accurate, save and except for changes, corrections, additions or deletions indicated by me on the DEPOSITION ERRATA SHEET hereof, with the understanding that I offer these changes as if still under oath.

Signed on the \_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_,  
at \_\_\_\_\_, \_\_\_\_\_.  
(City) (State)

\_\_\_\_\_  
CEASAR MCDOWELL



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1 I, RONNY ZAVOSKY, CSR No. 12359, certify that  
2 the foregoing proceedings were taken before me at the  
3 time and place therein set forth, at which time the  
4 witness was duly sworn and that the transcript is the  
5 true record of the testimony so given;

6  
7 Witness review, correction and signature;

8 (X) shall be per venue code ( ) was requested

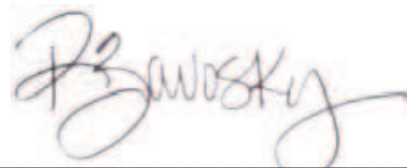
9 ( ) was not requested ( ) was waived

10 ( ) not handled by the deposition officer due to  
11 party stipulation

12  
13 The dismantling, unsealing, or unbinding of  
14 the original transcript will render the reporter's  
15 certificate null and void.

16 I further certify that I am not financially  
17 interested in the action, and I am not a relative or  
18 employee of any attorney of the parties, nor of any of  
19 the parties.

20 Dated this 1st day of August, 2025.

21  
22 

23  
24 RONNY ZAVOSKY, CSR NO. 12359  
25 CERTIFIED SHORTHAND REPORTER

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# **EXHIBIT 76**



### **CEASAR MCDOWELL - CO-FOUNDER & CEO**

Ceasar McDowell is the Co-Founder & CEO of Unite The People Inc., a nonprofit organization dedicated to social justice advocacy and legal assistance for incarcerated and formerly incarcerated individuals. He also serves as the Vice President of the Southern California Black Chamber

of Commerce, Long Beach Chapter. In addition to his legal advocacy work, McDowell operates UTP Sober Living Homes & Transitional Housing, providing safe, structured housing and support services for individuals in recovery and reentry. As a proud member of the Sober Living Coalition, he is committed to helping people rebuild their lives and reintegrate into society successfully.

Born and raised in Rialto, California, McDowell grew up in a family deeply involved in the justice system, helping his father build 24/7 Bail Bonds into one of the state's leading bail bond companies. His early exposure to the legal system shaped his lifelong commitment to justice and legal advocacy.

While incarcerated at San Quentin State Prison for 20 years, McDowell became a mentor and conviction consultant, guiding his peers through legal challenges. He earned AS and AAS degrees from Palos Verdes Community College, participated in computer coding programs, and registered screenplays with The Writers Guild of America. His story was also featured in Netflix's documentary "Q-Ball", which explores the San Quentin basketball squad and the lives of its incarcerated players.

Since his release, McDowell has been a driving force in legislative change and social reform. Under his leadership, Unite The People Inc. played a key role in drafting a portion of Governor Newsom's California Budget Act of 2020, securing 12 weeks of positive programming credits for qualifying CDCR inmates during the COVID-19 pandemic. Working with Senator Nancy Skinner and Advisory Board member Marvin Deon, this initiative helped thousands of incarcerated individuals.

Beyond his legal advocacy, McDowell works closely with Pacific Gateway, a disadvantaged youth program in Long Beach, helping young people develop essential skills and access opportunities for success.

Currently, McDowell is leading Unite The People Inc.'s statewide campaign to abolish sentencing enhancements, working alongside organizations such as Athletes for Impact and The Weldon Project. As the organization expands, he is spearheading the opening of a second office in Philadelphia, further extending its reach and advocacy efforts.

Throughout his career, McDowell has collaborated with Tiffany Haddish, Senator Nancy Skinner, Tom Sizemore, Weldon Angelos, and many other advocates who share his passion for justice reform.

Today, McDowell remains deeply involved in the daily operations of Unite The People Inc., working tirelessly to address systemic injustices, empower communities, and drive meaningful legislative change.

# EXHIBIT 77

Instagram

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Hello,  
My name is Ceasar McDowell, CEO of Unite The People. As you may know, Grammy Award-nominated artist and philanthropist Tory Lanez is a three year member of the advisory board for our organization. As a whole, we stand for fighting against social injustices including the prosecution of innocent people. As you also know, Tory is currently on trial and being egregiously accused of something he did not do. Keeping in line with our common goals, mission and reform efforts, all areas that Tory has avidly aided Unite The People inc physisally and monetarily, we would love for all of you, his friends, family and fans, to rally and show a united front to protest these charges. If you are available, please meet us tomorrow at Los Angeles court house 210 w temple Los Angeles at 10am. Signs and other materials will be provided for you to join us in support of our brother and fellow advocate. I look forward to seeing you tomorrow and continuing to fight for our overall cause.

Sincerely,  
Ceasar McDowell  
CEO, Unite The People  
IG: @ceasar\_mcdowell  
[unitethepeople.org \(http://unitethepeople.org/\)](http://unitethepeople.org/)  
IG: @unitethepeopleusa (<https://www.instagram.com/unitethepeopleusa/>)



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Hello,

My name is Ceasar McDowell, CEO of Unite The People. As you may know, Grammy Award-nominated artist and philanthropist Tory Lanez is a three year member of the advisory board for our organization. As a whole, we stand for fighting against social injustices including the prosecution of innocent people. As you also know, Tory is currently on trial and being egregiously accused of something he did not do. Keeping in line



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**Exhibit 77**

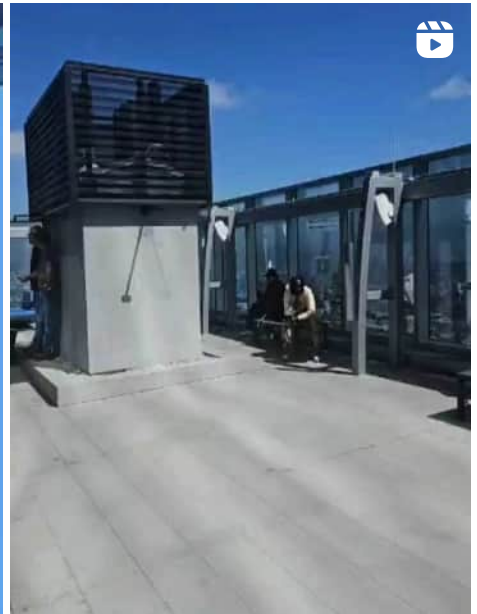
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#### IMMEDIATE RELEASE

**Evidence in Tory Lanez Case to Be Unveiled at Press Conference- Wednesday May 14, 2025**

**Los Angeles, CA** — On Wednesday May 14<sup>th</sup> at 10am Members of the media are invited to attend a critical press conference where newly revealed, exculpatory evidence will be revealed in the case of Daystar Peterson, known to the public as Tory Lanez.

The legal team at Unite The People will present key evidence that could significantly impact the understanding of the case and raise important questions about the legal process and the outcome. This material is expected to bring new context and clarity to one of the most high-profile legal cases in recent memory.

"We are committed to transparency, justice, and the right to a fair legal process," said a representative of the legal team. "We believe the public and the press have a right to see this material, and to stand its weight."

**Regarding the violent stabbing of Tory Lanez that occurred yesterday, there are now multiple pieces of evidence that must be addressed with the media. This press conference will not only provide an update on newly revealed evidence, but also provide an update on Tory's condition and the legal implications of recent events.**

The growing calls for Governor Gavin Newsom and the broader legal community to reexamine the case, this event marks a pivotal moment in the fight for due process.

**ATTENDANCE IS STRONGLY ENCOURAGED.**

#### Details:

**Date:** Wednesday, May 14, 2025

**Time:** 10a

**Location:** Downtown LA (Address Will be given upon approval)

**Media Contact:** Info@UniteThePeople.org

Invited members of the press will receive access to the evidence, legal commentary, and supporting materials. RSVP required to attend.

Stand By....#freetorylanez  
announcement about to drop



Tory was stabbed 14 times – including 10 to his back, 4 to his torso, 2 to the side of his head, and 1 to the left side of his chest. Both of his lungs collapsed, and he was placed on a breathing apparatus. He is now breathing on his own. Despite being in pain, he is talking normally, in good spirits, and is deeply thankful to God that he is pulling through. He also wants to thank everyone for their continued prayers and support.

Instagram

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# **EXHIBIT 78**

C. MCDOWELL  
07.25.25

**Exhibit 78**

RONNY ZAVOSKY

Document title: UTP In The Media — Unite The People Inc.

Capture URL: <https://unitethepeople.org/utpinthemedial>

Page loaded at (UTC): Thu, 24 Jul 2025 20:20:47 GMT

Capture timestamp (UTC): Thu, 24 Jul 2025 20:21:58 GMT

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## Unite The People Inc.: "IN THE MEDIA"

THIS PAGE FEATURES ALL OF THE NEWS OUTLETS, PODCASTS, RADIO STATIONS, ETC. THAT UNITE THE PEOPLE INC. IS FEATURED ON! CLICK ON THE TITLE, TAKE A LOOK, AND SHARE YOUR FAVORITE ARTICLE!

### SPECTRUM NEWS: ALLAN MCINTOSH

"I'm probably the happiest man on Earth right now."-Allan McIntosh

After spending 20+ years incarcerated and isolated from his family for gun possession, Allan McIntosh has finally been resentenced and freed.



### UCLA RADIO - AN INTERVIEW WITH UNITE THE PEOPLE'S CEO, CEASAR MCDOWELL

"Unite the People here, how can I help you?"

14 years into his prison sentence — three life sentences for a non-violent crime — Ceasar McDowell founded Unite the People, a non-profit organization providing legal services for low-income communities in California, right from his cell at San Quentin State Prison. By working with his brother on the outside, he built a website, filed paperwork, and took company calls on a contraband cell-phone.

### SIGNAL TRIBUNE - "FORMER LA PROSECUTOR JOINS LONG BEACH-BASED LEGAL NONPROFIT TO FIGHT FOR INCARCERATED PEOPLE"

After spending years holding plaintiffs accountable as a deputy city attorney for Los Angeles, Rosemary Chávez will now be holding other prosecutors accountable as part of the Long Beach-



After spending years holding plaintiffs accountable as a deputy city attorney for Los Angeles, Rosemary Chávez will now be holding other prosecutors accountable as part of the Long Beach-based legal nonprofit Unite The People. "It's important that someone with a background in criminal work looks to see that the prosecution was done correctly and the judge's rulings were applied with justice in mind," Chávez told the Signal Tribune. Now that Chávez has joined Unite The People, her expertise will be available to people who otherwise couldn't afford it.



Rosemary Chavez poses for a portrait with Cesar McDowell, CEO of Unite the People, outside their office on Feb. 10, 2022. Chavez is a former deputy city attorney for Los Angeles and will now be working with the non-profit organization to help free people incarcerated. (Richard H. Grant | Signal Tribune)



#### SPECTRUM NEWS: INSIDE THE ISSUE

In this special edition of "Inside The Issues" with Alex Cohen, one of Unite The People Inc.'s clients has their story told. Alex Cohen and Daniela Parto of Spectrum News, help share the story of Allan McIntosh and his family; and supplies a real life example of how disproportionate sentencing is still playing a role in our society to this day.

#### SPECTRUM NEWS: THE SOCIAL SCENE

Our CEO and Co-Founder, Cesar McDowell, spoke with Spectrum News' "The SoCal Scene", hosted by Melvin Robert and crew, about how the recent uptick in robberies is impacting prison reforms. Make sure to check out the interview from Spectrum News if you have not done so already!



RECENT UPTICK IN ROBBERIES IS IMPACTING PRISON REFORMS PER UNITE THE PEOPLE



#### GEORGE GASCON TALK & CESAR MCDOWELL SPECTRUM NEWS INTERVIEW

"CEO of Unite The People, Cesar McDowell, sits down with George Gascon and survivors of violent crimes to discuss what resources should be available to these victims. Listen to this interview by Spectrum News that discusses more of Cesar's story and what this talk meant to him."







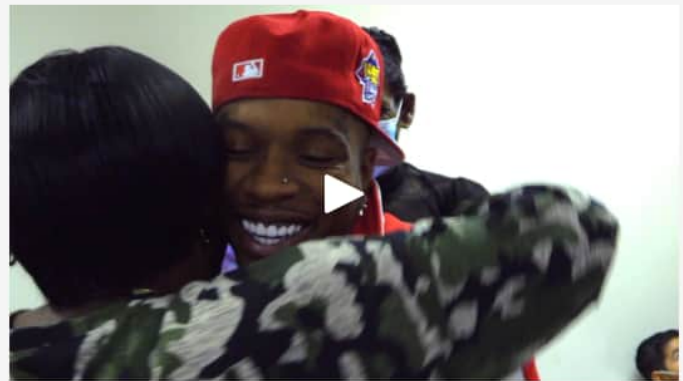
CEO of Unite The People, Ceasar McDowell, sits down with George Gascon and survivors of violent crimes to discuss what resources should be available to these victims. Listen to this interview by Spectrum News that discusses more of Ceasar's story and what this talk meant to him.

#### LONG BEACH POST: RAPPER TORY LANEZ GIVES \$50K TO PAY LEGAL FEES FOR 30 FAMILIES

Canadian rapper, singer-songwriter, and record producer Tory Lanez stopped by the Unite the People office in Downtown Long Beach and donated \$50,000 to pay off the legal fees for 30 families on Friday. Most of the families were completely surprised by his appearance and gesture. "Going through my own situations, I can understand how the legal system can be," Lanez said as he spoke to the families. Lanez has been an advisory board member with Unite the People for three years and the organization is diligently working on prison reform. But at this moment, he felt paying off the legal fees would provide an immediate impact.

“CEO of Unite The People, Ceasar McDowell, sits down with George Gascon and survivors of violent crimes to discuss what

resources should be available to these victims. Listen to this interview by Spectrum News that discusses more of Ceasar's story and what this talk meant to him.”



**TMZ** NEWS SPORTS VIDEOS PHOTOS TOURS WATCH TMZ

Tory Lanez Donates \$50,000 To Help Families Post Bail For Loved Ones

## TORY LANEZ DONATES \$50K TO HELP FOLKS POST BAIL ... I'm Uniting The People!!!

EXCLUSIVE f 973 9/17/2021 3:30 PM PT

#### TMZ: TORY LANEZ DONATES \$50K..."I'M UNITING THE PEOPLE!"

Tory Lanez stopped by the Unite the People office in Downtown Long Beach and donated \$50,000 to pay off the legal fees for 30 families on Friday. Most of the families were completely surprised by his appearance and gesture. Lanez has been an advisory board member with Unite the People for three years and the organization is diligently working on prison reform. But at this moment, he felt paying off the legal fees would provide an immediate impact. "People think the goal is to be successful. My goal is not to be successful. Success is just the platform in which I help people from," Lanez said.





### LA OPINION: SORPRENDEN A FAMILIAS CON DONATIVO DE \$50,000 PARA PAGAR SERVICIOS LEGALES DE SUS ENCARCELADOS

El rapero canadiense Tory Lanez sorprendió a 20 familias de California, al donarles entre \$1,000 y \$5,000 a cada una para que paguen por los servicios legales de sus familiares en prisión, que ya fueron sentenciados. "Para mí, significa el mundo poder ayudarlos", dijo Lanez, quien desde hace tres años es miembro de la directiva de la organización no lucrativa Unite The People, a través de la cual donó \$50,000 para ayudar con el pago de los servicios legales de los encarcelados convictos. El popular rapero recordó a las familias latinas, afroamericanas y asiáticas reunidas para recibir los donativos, que él fue un desamparado a los 14 años, suplicando por dinero en las calles.



### EVERYDAY INJUSTICE PODCAST EPISODE 120: CESAR MCDOWELL TURNS HIS LIFE AROUND AT SAN QUENTIN

Cesar McDowell chronicles his journey from San Quentin to becoming, while still incarcerated, the co-founder and CEO of Unite The People Inc., a non profit organization that promotes social justice and offers affordable legal services throughout the state of California. After spending 20 years in prison and falling victim to the social inequality in our criminal justice system, McDowell founded his organization from his prison cell with the hope of saving all those who have been wrongly prosecuted and sentenced. It is an incredible story of perseverance and redemption and McDowell walks the audience through it. McDowell on Everyday Injustice shares his story about how he spent 20 years incarcerated in one of the CDCR's toughest





...based on saving all those who have been wrongly prosecuted and sentenced. It is an incredible story of perseverance and redemption and McDowell walks the audience through it. McDowell on *Everyday Injustice* shares his story about how he spent 20 years incarcerated in one of the CDCR's toughest facilities, San Quentin State Prison; under an illegal sentence.

**KHSU: AS CALIFORNIA PREPARES TO RELEASE UP TO 8,000 INMATES, ADVOCATES ASK WHAT'S NEXT**

*"Until late May, San Quentin had remained untouched by the coronavirus. That quickly changed when a group of 121 incarcerated people from the California Institution for Men in Chino were transferred to the Marin County facility without being tested immediately beforehand." Cesar McDowell, CEO and Co-Founder of Unite The People Incorporated discussed his experience with COVID-19 while incarcerated at one of California's toughest prisons in San Quentin State Prison.*



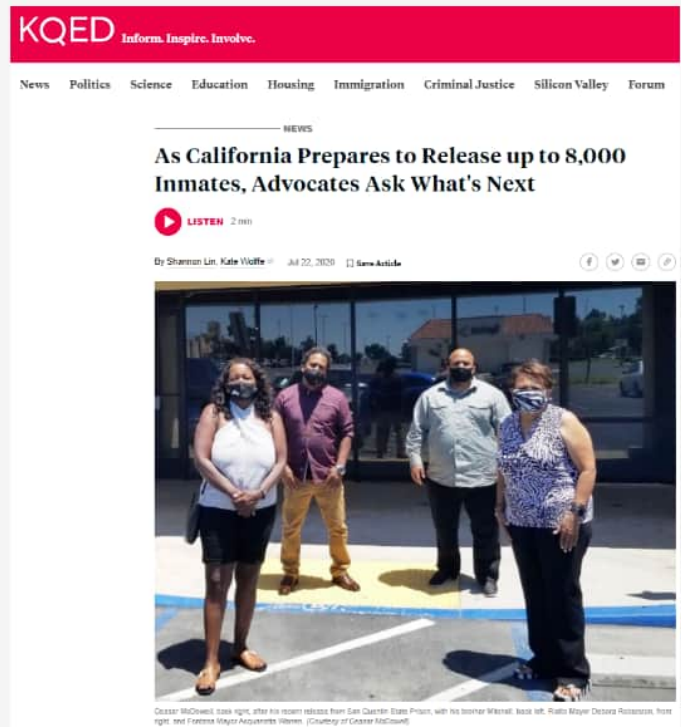
**LONG BEACH POST PODCAST: HOW UNITE THE PEOPLE IS HELPING PEOPLE GAIN THEIR FREEDOM**

This week on the Word on Long Beach we take a closer look at how the nonprofit organization Unite the People Inc. began. Cesar McDowell spent 20 years in prison for a non-violent offense based on California's "three strikes law," which increased prison sentences for those with previous felony convictions. From his prison cell, he started Unite the People Inc., to help people who were in his situation and do not have the means to retain a competent attorney. If you would like to know more or get involved with Unite the People Inc., you can visit their office at 555 E. Ocean Blvd., suite 205. You can call them at 888-245-9393 or, you donate or learn more via their website.



## KQED: CALIFORNIA PREPARES TO RELEASE UP TO 8,000 INMATES

*Cesar McDowell was released from San Quentin State Prison on June 26, his pre-scheduled release date — unrelated to the coronavirus — after serving a 20-year sentence on a three strikes violation. The 46-year-old from Rialto, California spent his last four days in the prison's COVID-19 ward, even though he had no symptoms and never received the results of the coronavirus test he had taken as a “just-in-case” measure, he said. McDowell said those final days — sitting in a cell with men coughing all around him — were some of the most brutal of his entire incarceration.*



**TUESDAY, MARCH 30, 2021**  
**EXPANDING EMPATHY**  
 THE ROLE OF SURVIVORS IN REIMAGINING A NEW JUSTICE SYSTEM  
 Powered by Summit & Revolve Impact  
**5PM - 6PM PST**  
**RSVP NOW**

**George Gascón**  
 Los Angeles District Attorney

**Megan Rapinoe**  
 Professional Soccer Player

**Cesar McDowell**  
 Co-founder & CEO, Unite the People

SUMMIT IMPACT ATHLETES FOR IMPACT

## REVOLVE IMPACT'S EXPANDING EMPATHY (TOWN HALL MEETING)

On Tuesday, March 30th, [Revolve Impact](#), [Summit](#), [Athletes for Impact](#), and [Unite The People Inc.](#), brought together George Gascón, Los Angeles District Attorney; Cesar McDowell, CEO & Co-Founder of Unite the People; and Professional Soccer Player, Megan Rapinoe, for a discussion on the role of survivors and systems-impacted people in the re-imagining of and the building of a new justice system. For more information on this event, visit the “Our Work” tab, at the top of our page.

## SIGNAL TRIBUNE (INTERVIEW & ARTICLE)

“Three-strikes law keeps Long Beach man in prison for 22 years on nonviolent charge.” “Cesar McDowell poses with a picture of his mug shot from when he was arrested in 2000 in the office of his non-profit organization Unite the People in Long Beach on July 6, 2021. On his wall are photos from prison and other accomplishments he has made since getting out... As of Wednesday, June 30, McDowell’s nonprofit organization Unite the





nonviolent charge.” “Ceasar McDowell poses with a picture of his mug shot from when he was arrested in 2000 in the office of his non-profit organization Unite the People in Long Beach on July 6, 2021. On his wall are photos from prison and other accomplishments he has made since getting out... As of Wednesday, June 30, McDowell’s nonprofit organization Unite the People has gathered 29,144 signatures on an online petition to get McIntosh resentenced by the Los Angeles County District Attorney’s Office.”

## Three-strikes law keeps Long Beach man in prison for 22 years on nonviolent charge

BY KRISTEN FARIAH NAEEM, STAFF WRITER - JULY 6, 2021



Ceasar McDowell poses with a picture of his mug shot from when he was arrested in 2000 in the office of his non-profit organization Unite the People in Long Beach on July 6, 2021. On his wall are photos from prison and other accomplishments he has made since getting out. (Richard H. Grant | Signal Tribune)



### HIP HOP ZONE RADIO (INTERVIEW)

In December 2020, Ceasar McDowell sat down with Hip Hop Zone and discussed his time incarcerated, how he started the organization, and the organization's plans for the future. This interview provides an in depth look at the origin of Unite The People Inc.!

### UNIVISION: THREE STRIKES PROTEST

Unite the People, formally known as “We the People Org,” formed a protest in the city of Los Angeles to take a stand against the various issues surrounding our criminal justice system. Mass incarceration in America is an epidemic, and has become a burden on families and taxpayer dollars. Unite the People, organizers of The People’s Fair Sentencing and Public Safety Act of 2018, hopes to eradicate the Three Strikes Law. The organization hopes to push many other prison and sentence reforms.



Formerly incarcerated activists demand Gov.

94.1 KPFA: FORMERLY INCARCERATED ACTIVISTS DEMAND



## Formerly incarcerated activists demand Gov. Newsom visit San Quentin & see dangerous conditions himself; Plus, faith leaders plan Black Lives Matter Sabbath Weekend

▶ LISTEN   DOWNLOAD   OPEN IN ITUNES



Advocates hold a press conference outside San Quentin State Prison on Thursday. Photo from Ella Baker Center

### 94.1 KPFA: FORMERLY INCARCERATED ACTIVISTS DEMAND GOV. NEWSOM VISIT SAN QUENTIN

Thursday, activists with the #StopSanQuentinOutbreak campaign held a press conference outside of the prison to call on Gov. Gavin Newsom to release incarcerated people with nonviolent convictions to slow the spread of the virus inside the prison, which is dangerously overcrowded. We spoke with Ceasar McDowell, who is now working with Unite the People, a nonprofit organization promoting social justice and providing affordable legal services for disadvantaged communities.

### LOCKED IN: BREAKING BREAD PODCAST

*Locked in is a grassroots organization comprised of people passionate about social justice and wanting to make lasting change for those affected by injustice. Locked In is focused primarily on 3 pillars: Communication, Education, & Action. In our podcast Break Bread, host Dee Marie sits down at the table and has meaningful conversations with people who have been affected by the justice system and those that are active in reform.*

*"It is official, Season 2 is out and what an episode to drop with! Ceasar gets real and shares so many stories and truth nuggets with DeeMarie. Some of what he talks about are why he started robbing and how he got 3 strikes for doing nothing, how it was being in San Quentin at the height of Covid, and how he started his non-profit Unite the People from his prison cell. This episode is so good we had to go longer than usual."*







Advocates hold a press conference outside San Quentin State Prison on Thursday. Photo from Ella Baker Center

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[info@unitethepeople.org](mailto:info@unitethepeople.org)

Tax Exempt EIN #82-2750315

Office Hours:

M-Th 10am - 4pm

Fri 10am - 3pm

OFFICE VISITS BY APPOINTMENT ONLY

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# EXHIBIT 79

C. MCDOWELL  
07.25.25

**Exhibit 79**

RONNY ZAVOSKY

## Original Message

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From: Jazmyne Jamison <jaz@unitethepeople.org>

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Hey ladies,

As mentioned, the Writ of Habeas Corpus for Daystar is attached.

Jaz=F0=9F=92=9A

888-245-9393

Unite The People, Inc.

555 E. Ocean Blvd Suite 205

Long Beach, CA 90802

----- Forwarded message -----

From: mr. mcdowell <ceasarceo@gmail.com>

Date: Tue, Dec 12, 2023 at 2:01 PM



Subject: 2023-12\_Peterson\_WHC\_Appellate Court\_Final to File.pdf

To: jaz@unitethepeople.org <jaz@unitethepeople.org>

--00000000000007a1af6060c574e17

Content-Type: text/html; charset="UTF-8"

Content-Transfer-Encoding: quoted-printable

<div dir=3D"auto">Hey ladies,</div><div dir=3D"auto"><br>  
</div><div dir=3D"=auto">As mentioned, the Writ of Habeas Corpus for Daystar is attached.=C2=  
=A0<br clear=3D"all"><br><div dir=3D"auto"><div dir=3D"ltr" class=3D"gmail\_=signature" data-smartmail=3D"gmail\_signature">Jaz=F0=9F=92=9A<br><br>888-24=5-9393<br>Unite The People, Inc.<br>555 E. Ocean Blvd Suite 205<br>Long=C2=  
=A0Beach, CA 90802</div></div></div><div><br></div><div><br><div class=3D"g-mail\_quote"><div dir=3D"ltr" class=3D"gmail\_attr">-----  
Forwarded mess=  
age -----<br>From: <strong class=3D"gmail\_sendername" dir=3D"auto">mr. =  
mcdowell</strong> <span dir=3D"auto">&lt;<a href=3D"mailto:ceasarceo@gmail.=com">ceasarceo@gmail.com</a>&gt;</span><br>Date: Tue, Dec 12, 2023 at 2:01 =  
PM<br>Subject: 2023-12\_Peterson\_WHC\_Appellate Court\_Final to File.pdf<br>To=  
: <a href=3D"mailto:jaz@unitethepeople.org">jaz@unitethepeople.org</a> &lt;=  
<a href=3D"mailto:jaz@unitethepeople.org">jaz@unitethepeople.org</a>&gt;<br>  
></div><br><br></div></div>

--00000000000007a1af6060c574e17--

--00000000000007a1af8060c574e19

Content-Type: application/pdf; name="2023-

12\_Peterson\_WHC\_Appellate Court\_Final to File.pdf"

Content-Disposition: attachment; filename="2023-

12\_Peterson\_WHC\_Appellate Court\_Final to File.pdf"

Content-Transfer-Encoding: base64

Content-ID: <18c600be6a3c91914bf1>

X-Attachment-Id: 18c600be6a3c91914bf1

--00000000000007a1af8060c574e19--



# **EXHIBIT 80**

C. MCDOWELL  
07.25.25

**Exhibit 80**

RONNY ZAVOSKY

## Original Message

Message ID	<CABGSRjnhgRHsyf7v+WSmQ58C=dxAL-1NrtCHwzB8u+V+h5s8qA@mail.gmail.com>
Created at:	Tue, Feb 27, 2024 at 7:43 PM (Delivered after 15 seconds)
From:	Jazmyne Jamison <jaz@unitethepeople.org>
To:	milagrogramz@gmail.com, tia@teawithtia.org, torylanezdaily@gmail.com
Subject:	Fwd: Peterson_Filed AOB_UTP.pdf
SPF:	NEUTRAL with IP 209.85.220.41 <a href="#">Learn more</a>
DKIM:	'FAIL' with domain unitethepeople-org.20230601.gappssmtp.com (unaligned From and DKIM domains) <a href="#">Learn more</a>

[Download Original](#)

[Copy to clipboard](#)

```
Delivered-To: milagrogramz@gmail.com
Received: by 2002:ad4:40c5:0:b0:68c:cf60:75f0 with SMTP id
x5csp2847220qvp;
      Tue, 27 Feb 2024 17:44:00 -0800 (PST)
X-Received: by 2002:adf:e10f:0:b0:33d:5350:774a with SMTP id
t15-
20020adfe10f000000b0033d5350774amr8079747wrz.11.1709084638811
;
      Tue, 27 Feb 2024 17:43:58 -0800 (PST)
ARC-Seal: i=1; a=rsa-sha256; t=1709084638; cv=none;
      d=google.com; s=arc-20160816;

b=FaAdIq/3CKVh7UXfoTtrIGZiHYi6XsmFThVn0Lf/9RMiiOhniICXCI/iz3Q
jc3WpkN
```

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9ErS/X5

es3+wJbYIyveWwTkTUZnyOYUycyp6mfn4MhHf6+sJh+ZmkVlxIWsdJNHgtdwy  
/Ke2Hvw

fSMbMi4ChZl2aDTxDnzZlhBuqLgXnPpMUWvFsIIFPcjlyPAcyIE62JXTfRM6X  
pw36m3e

pJjLZxHzAGzluMxpiIVBQyXPb91jaNwlzp4PME5cVI6Xkae3EWwIx8J9+roN7  
4zdriYx

3bew==

ARC-Message-Signature: i=1; a=rsa-sha256; c=relaxed/relaxed;  
d=google.com; s=arc-20160816;

h=to:subject:message-id:date:from:in-reply-  
to:references:mime-version

:dkim-signature;

bh=IPr2KzLABUK00SWS9AhZRqAPRnQ6F7WU6JjoOUq7Cf4=;

fh=ojaFV+Qz+7mCgqkKoiWRdPToQZNE3+yJ3HFIX+SAXyw=;

b=cq6ZMsVYYENSda62jN8qHUwVh+0UyN7Fg7ECMeLSvzXmt/5+s/UNlZKXFf  
gy5/Mgt

fQzIG5G2ZUb2TF5kH6KwF7N6udUH006pbqfXyR200IAbcU0boyDypTsOmCezP  
WxjhK+z

HYBz7y1p/CerRDDmoLD58itMffuxudARkXnCZyyrDjx75ylfirKnGp5/cv9J  
VfT7Y0U

O5B6buXI56o01fye65E5oL323gbZaN8B7aOBjUfdRtS5yxcP/ww4ibGDDKf+p  
kW6k9wO

TrUkPZJ84/XLVzYtuE7HJUhsKpc0RZ0Xl57RjgtDkm3aKvso0Ko2vvsWafUBe  
KHbokPf

Izlw==;

dara=google.com

ARC-Authentication-Results: i=1; mx.google.com;

dkim=pass header.i=@unitethepeople-  
org.20230601.gappssmtp.com header.s=20230601  
header.b=DwLQeyp0;

spf=neutral (google.com: 209.85.220.41 is neither  
permitted nor denied by best guess record for domain of  
jaz@unitethepeople.org) smtp.mailfrom=jaz@unitethepeople.org  
Return-Path: <jaz@unitethepeople.org>

Received: from mail-sor-f41.google.com (mail-sor-  
f41.google.com. [209.85.220.41])

by mx.google.com with SMTPS id c2-

20020adfa302000000b0033dffbfc443sor34208wrb.4.2024.02.27.17.4  
3.58

for <milagrogramz@gmail.com>

(Google Transport Security);

Tue, 27 Feb 2024 17:43:58 -0800 (PST)

Received-SPF: neutral (google.com: 209.85.220.41 is neither permitted nor denied by best guess record for domain of jaz@unitethepeople.org) client-ip=209.85.220.41; Authentication-Results: mx.google.com; dkim=pass header.i=@unitethepeople-org.20230601.gappssmtp.com header.s=20230601 header.b=DwLQeyp0; spf=neutral (google.com: 209.85.220.41 is neither permitted nor denied by best guess record for domain of jaz@unitethepeople.org) smtp.mailfrom=jaz@unitethepeople.org DKIM-Signature: v=1; a=rsa-sha256; c=relaxed/relaxed; d=unitethepeople-org.20230601.gappssmtp.com; s=20230601; t=1709084638; x=1709689438; dara=google.com; h=to:subject:message-id:date:from:in-reply-to:references:mime-version :from:to:cc:subject:date:message-id:reply-to; bh=IPr2KzLABUK00SWS9AhZRqAPRnQ6F7WU6JjoOUq7Cf4=;

b=DwLQeyp0jZ2I7xEWBvvJWqHyO4B9GUdk9H8wls9s7/i7P3h4cGk70XjtrAvU4Y+Vd

fIBwZF170DR2dIAE0MxH0Plz6p5YyTrnlEKRLUr/H8fy9n+2o38IgMqEpuNvoDXeYS1k

G+8YgcIcmit7yAxCnfzDmHTWUHa81MvDug58Ypt3gpVxYOS5zRQdMni6Q3sTav28fFYd

wuV80R7YNyxuj3LVFkkF1QAhGPqcHfhdtToX3p0sfZq6+TkSA5hjLYw3OwbcQR76he76G

eBy8PiztFQnuSn/AGedSi2bt/gMpIBIldWYyNx8A8kVsx3cH70V97hjMNSMZu6iJlyer

rYWg==

X-Google-DKIM-Signature: v=1; a=rsa-sha256; c=relaxed/relaxed; d=1e100.net; s=20230601; t=1709084638; x=1709689438; h=to:subject:message-id:date:from:in-reply-to:references:mime-version :x-gm-message-state:from:to:cc:subject:date:message-id:reply-to; bh=IPr2KzLABUK00SWS9AhZRqAPRnQ6F7WU6JjoOUq7Cf4=;

b=HVvxHOCWG47i0VC4jMMNGoR6Lw8SgouAbqcD6p6vnx7XJxFQKEVMUJ5GPT7PJBZH/H

DtIE2wToRgUWr/zDu/gCwvQGMBDKkvYjvNRpZpjzY4SjY+wzokWgmVeuzSoOqnlackav

TN6Cq79y2Brot/bicjgU8+dXdiPH470Jg6Nv7q3FMf7sp2CxCgjPTqJH/bbw6JwezAT7

JQcOJlAMImWiSjs+RSkomK3x2fns0LkzvVQnVyseWLygJduewYmKo2YEaaNq4alnStcG

ZlBw7RHsgCih3eGY2x05uJAwlAhXpQrM4Lze/zTUgll1i9VNaWMfhgLiVO3cMC  
qLfih9g

4QcA==

X-Gm-Message-State:

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Rd3y4alef0TFL+

hGbT78V8/qZw7CV00/VEyHw3YP0OU8MB0Lp9dpkgjH7xK2v7J

X-Google-Smtp-Source:

AGHT+IG+U7UwYPBXY75Jg4WMmVQ9ELAAAXVZ0guzJMGWPj4VyOO+yjwJYZoFC  
IGkyriKNy7X4PlhjSHKu+Xjjn65lC8=

X-Received: by 2002:a5d:5f8d:0:b0:33d:ca56:a616 with SMTP id  
dr13-

20020a5d5f8d000000b0033dca56a616mr7371301wrb.36.1709084637031  
; Tue, 27 Feb 2024 17:43:57 -0800 (PST)

MIME-Version: 1.0

References: <CAEqU2UqA9v1+gxUoMJWglq\_tXgJo3NZhiG-  
4xSNweEC2wzbrDQ@mail.gmail.com>

In-Reply-To: <CAEqU2UqA9v1+gxUoMJWglq\_tXgJo3NZhiG-  
4xSNweEC2wzbrDQ@mail.gmail.com>

From: Jazmyne Jamison <jaz@unitethepeople.org>

Date: Tue, 27 Feb 2024 17:43:43 -0800

Message-ID: <CABGSRjnhgRHsyf7v+WSmQ58C=dxAL-  
1NrtCHwzB8u+V+h5s8qA@mail.gmail.com>

Subject: Fwd: Peterson\_Filed AOB\_UTP.pdf

To: milagrogramz@gmail.com, tia@teawithtia.org,  
torylanezdaily@gmail.com

Content-Type: multipart/mixed;

boundary="000000000000aea7c1061267464b"

--000000000000aea7c1061267464b

Content-Type: multipart/alternative;

boundary="000000000000aea7c00612674649"

--000000000000aea7c00612674649

Content-Type: text/plain; charset="UTF-8"

Here you go!

Thank you,

Jaz

888-245-9393

Unite The People, Inc.

555 E. Ocean Blvd Suite 205

Long Beach, CA 90802

----- Forwarded message -----

From: Ceasar McDowell <ceasar\_mcdowell@unitethepeople.org>

Date: Tue, Feb 27, 2024 at 5:41 PM

Subject: Peterson\_Filed AOB\_UTP.pdf

To: <jaz@unitethepeople.org>

--000000000000aea7c00612674649

Content-Type: text/html; charset="UTF-8"

Content-Transfer-Encoding: quoted-printable

<div dir=3D"auto">Here you go!<br clear=3D"all"><br  
clear=3D"all"><div><div=  
dir=3D"ltr" class=3D"gmail\_signature" data-  
smartmail=3D"gmail\_signature">T=  
hank you,<br>Jaz<br><br>888-245-9393<br>Unite The People,  
Inc.<br>555 E. Oc=  
ean Blvd Suite 205<br>Long=C2=A0Beach, CA 90802</div></div>  
</div><div><br><=  
/div><div><br><div class=3D"gmail\_quote"><div dir=3D"ltr"  
class=3D"gmail\_at=  
tr">----- Forwarded message -----<br>From: <strong  
class=3D"gmail\_=  
sendername" dir=3D"auto">Ceasar McDowell</strong> <span  
dir=3D"auto">&lt;<a=  
  
href=3D"mailto:ceasar\_mcdowell@unitethepeople.org">ceasar\_mcd  
owell@uniteth=  
epeople.org</a>&gt;</span><br>Date: Tue, Feb 27, 2024 at 5:41  
PM<br>Subject=  
: Peterson\_Filed AOB\_UTP.pdf<br>To: &lt;<a  
href=3D"mailto:jaz@unitethepeop=  
le.org">jaz@unitethepeople.org</a>&gt;<br></div><br><br>  
</div></div>

--000000000000aea7c00612674649--

--000000000000aea7c1061267464b

Content-Type: application/pdf; name="Peterson\_Filed  
AOB\_UTP.pdf"

Content-Disposition: attachment; filename="Peterson\_Filed  
AOB\_UTP.pdf"

Content-Transfer-Encoding: base64

Content-ID: <18ded5fc2a956f85df91>

X-Attachment-Id: 18ded5fc2a956f85df91

--000000000000aea7c1061267464b--



# EXHIBIT 81

C. MCDOWELL  
07.25.25

Exhibit 81

RONNY ZAVOSKY

Original Message

Message ID	<CANmGTofpaMf4Mk5Rm3NSBsKPHpnGq2QB6oA=AMwBuUgqkPRjrA@mail.gmail.com>
Created at:	Sun, Aug 4, 2024 at 10:00 PM (Delivered after 14 seconds)
From:	Jaz Jamison <jaz@unitethepeople.org>
To:	MilagroGramz@gmail.com
Subject:	Fwd: Daystar Peterson - Atty General's Reply Brief
SPF:	NONE with IP 209.85.220.41 <a href="#">Learn more</a>
DKIM:	'FAIL' with domain unitethepeople-org.20230601.gappssmtp.com (unaligned From and DKIM domains) <a href="#">Learn more</a>

[Download Original](#)

Copy to clipboard

Delivered-To: milagrogramz@gmail.com  
Received: by 2002:a05:6a10:f553:b0:593:6025:3bcf with SMTP id m19csp1184955pxx;  
Sun, 4 Aug 2024 20:01:03 -0700 (PDT)  
X-Received: by 2002:a05:6102:f10:b0:48f:40c1:3cd0 with SMTP id ada2fe7eead31-4945be0bbbdmr7953126137.12.1722826848887;  
Sun, 04 Aug 2024 20:00:48 -0700 (PDT)  
ARC-Seal: i=1; a=rsa-sha256; t=1722826848; cv=none;  
d=google.com; s=arc-20160816;  
  
b=IZI+71G1HNP03WzKVGU4qnRLTUNclodKgDLhghakCknJyfcEZlWE1LlqT1XwPaH8hk  
  
cX2otF6CxtCSAtdpXzOWK1URX0z4hjRaPQ7Mgdv0nz2mEfbsXK7qJ/gFsSvCYsUhic  
hx  
  
eiM7cZ7cRsYogf+gBXiXNarS1cAXh2agXWhrBYC+pj4/RWfVfz65nLpmq2zjvgrmnB  
8+  
  
5nNYYJdE4wbp/Vcj/+fFI7pFg+wgJTKg+HmVw28XFUE4frB01U793SonnWZKjAwXAE

Xm

NTM22981NmTlxJxxIrndk7as2EB8tr7xH/9Dx8aKrCvRYIzzqtvCCi1lGoDrF/G2h+ND

4L+Q==

ARC-Message-Signature: i=1; a=rsa-sha256; c=relaxed/relaxed;  
d=google.com; s=arc-20160816;  
h=to:subject:message-id:date:from:in-reply-  
to:references:mime-version  
:dkim-signature;  
bh=fcul0m/rTX6qOgx9HLRt4qThbWolMhrT3bcf5yNLHv0=;  
fh=no0xgPlfYDc2oqCiflAj1Jgl68Ou6ShUSMvkruuXD2U=;

b=KIsSOSUCMt/QrLiUbeRslk6XzFzjT+QRUOHjzrpqtyFGJ+ykdwIbWMPVDSH4ZL3vJ4

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o+KJRVL4vthAjHhCyUBAxNIGBJj3n4rPujG7a/msdW9UdQQFefIKZwrwAmdKDCEdSaZF

f0MAP/lhe7RwIy9+GyfwzRhhJAJtL6ta7Ciu2ijpU14z1V3mFSyFogG+z6VIWPjUTyPP

JM6/wyyacCPamtKMw345wSl3WPvFcv5gl6JbVm8JlqDlMSRcp/rAcXJv1vbLaSlgv5aN

PFwA==;

dara=google.com

ARC-Authentication-Results: i=1; mx.google.com;  
dkim=pass header.i=@unitethepeople-  
org.20230601.gappssmtp.com header.s=20230601 header.b=2FAETnz6;  
spf=none (google.com: jaz@unitethepeople.org does not  
designate permitted sender hosts)  
smtp.mailfrom=jaz@unitethepeople.org;  
dara=pass header.i=@gmail.com  
Return-Path: <jaz@unitethepeople.org>  
Received: from mail-sor-f41.google.com (mail-sor-f41.google.com.  
[209.85.220.41])  
by mx.google.com with SMTPS id ada2fe7eead31-  
4945daf6a13sor610874137.9.2024.08.04.20.00.48  
for <MilagroGramz@gmail.com>  
(Google Transport Security);  
Sun, 04 Aug 2024 20:00:48 -0700 (PDT)  
Received-SPF: none (google.com: jaz@unitethepeople.org does not  
designate permitted sender hosts) client-ip=209.85.220.41;  
Authentication-Results: mx.google.com;  
dkim=pass header.i=@unitethepeople-  
org.20230601.gappssmtp.com header.s=20230601 header.b=2FAETnz6;  
spf=none (google.com: jaz@unitethepeople.org does not  
designate permitted sender hosts)  
smtp.mailfrom=jaz@unitethepeople.org;  
dara=pass header.i=@gmail.com  
DKIM-Signature: v=1; a=rsa-sha256; c=relaxed/relaxed;  
d=unitethepeople-org.20230601.gappssmtp.com; s=20230601;  
t=1722826848; x=1723431648; dara=google.com;  
h=to:subject:message-id:date:from:in-reply-

to:references:mime-version  
:from:to:cc:subject:date:message-id:reply-to;  
bh=fcul0m/rTX6qOgx9HLRt4qThbWolMhrT3bcf5yNLHv0=;

b=2FAETnz6QYuqMX7W5RPpk4pYj4BGsNW7lBdA8F+XFXLYnn5IcCBaLo4rSW40Phs7  
VS

UGXDJLeEplmdtrSVufOddPKg0Fc+Yv26rjOme+5G2u0alN5GZ5Fgb7FTwsOo/BoTJq  
A7

ol/+bLuSmhGrY+MsoTTk2LvX9MYFVy4zWre6TkdfKYA74tnqD4p9hWIs0GgjVv1bi  
2C

AK8sVVGyK+fgR36atbK9JiOSDbGg5/Djtp2jiUnR8UQM0l52C7B4mH/e/dVYiKCibb  
10

DazPQDj774voaDymqTmEOzo8YXK5ujUCxpBzzewoQlNFUwXjSrwnbFV3jIHkggxNRt  
qn  
+lvg==

X-Google-DKIM-Signature: v=1; a=rsa-sha256; c=relaxed/relaxed;  
d=le100.net; s=20230601; t=1722826848; x=1723431648;  
h=to:subject:message-id:date:from:in-reply-  
to:references:mime-version  
:x-gm-message-state:from:to:cc:subject:date:message-  
id:reply-to;  
bh=fcul0m/rTX6qOgx9HLRt4qThbWolMhrT3bcf5yNLHv0=;

b=Ie+sKl+nWGUx2rIwQERUKyAo4Wp6sFYh24v5avaGwMAPsyiZli/zXgY/nQbtlnfs  
fs

lMTODZioord0kdYb7xbx83lhzaQESCKPiL4LAZdbIE/h803HyKbuyVMA9It9XmYjEp  
II

YLPOWv2pCttucJBbpFFTgtxZidm4si+qCohqjPqyxnyd7xwNCwghmCXWqMMxN3ZO2  
eG

LGSARgN4rQmFfhElK99j9Qu8rrHPPqNwMdkqVF1+yrchBlz7Q8OhlBAvR3dpq7eujs  
JT

tU8RPsecSe+LYd7qlYaQr5wiA2xV9wUpOhe35Vb1NeZ7v+hjfLAFbn20Ceg/f9XkmW  
DT  
M97w==

X-Gm-Message-State:  
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QBZLnBHQUVtZskkaFUCbUy2hjGvNBfws16L7QHnNoA1ZAcD5ktNvO8gGHuRGs6sO1  
M/KpFX06z B8yN33i/RPszJRv1M1XbYGpwCnGEllZpHvYq8soiR759KknwG  
X-Google-Smtp-Source:  
AGHT+IEXhXdjRdyHVtblWXn2hACclghmAidChoJxVFH77AQbyr8lgttDSsZ6N4nFjL  
+Xx6eOsZzXYLXfyqeAkJaK+Oo=  
X-Received: by 2002:a05:6102:162c:b0:493:dbbc:7d56 with SMTP id  
ada2fe7eead31-4945be0a4e3mr6761595137.8.1722826845999; Sun, 04 Aug  
2024 20:00:45 -0700 (PDT)  
MIME-Version: 1.0  
References:  
<CAG+ASRzKYsrfrvDotbg9qCNSvdnQ+UFkDQ8UHgYUSs=NF9FrSw@mail.gmail.co  
m> <ldb2cc10-a900-4a03-9e4c-f7ec51419ael@unitethepeople.org>  
In-Reply-To: <ldb2cc10-a900-4a03-9e4c-

f7ec51419ael@unitethepeople.org>  
From: Jaz Jamison <jaz@unitethepeople.org>  
Date: Sun, 4 Aug 2024 20:00:34 -0700  
Message-ID:  
<CANmGTofpaMf4Mk5Rm3NSBsKPHpnGq2QB6oA=AMwBuUgqkPRjrA@mail.gmail.com>  
Subject: Fwd: Daystar Peterson - Atty General's Reply Brief  
To: MilagroGramz@gmail.com  
Content-Type: multipart/mixed;  
boundary="0000000000002aa392061ee6e2e8"

--0000000000002aa392061ee6e2e8  
Content-Type: multipart/alternative;  
boundary="0000000000002aa391061ee6e2e6"  
  
--0000000000002aa391061ee6e2e6  
Content-Type: text/plain; charset="UTF-8"  
Content-Transfer-Encoding: quoted-printable

Millie,

Please see the attachments below. As they pertain the AG Response to  
Daystar=E2=80=99s case.

Let me know if you have any questions or concerns.

Blessings, Jaz=F0=9F=92=9A

----- Forwarded message -----  
From: Ceasar McDowell <ceasar\_mcdowell@unitethepeople.org>  
Date: Sun, Aug 4, 2024 at 7:32 PM  
Subject: Fwd: Daystar Peterson - Atty General's Reply Brief  
To: <jaz@unitethepeople.org>

Get BlueMail for Android <<https://bluemail.me>>  
On Jul 29, 2024, at 10:34=E2=80=AFAM, Cynthia DeAngelo  
<cynthia@unitethepeople.org>  
wrote:  
>  
> Briefs attached.  
>  
  
>  
> --  
> Best Regards,  
>  
> Cyndi DeAngelo  
> Paralegal  
> \*Unite the People, Inc.\*  
>  
> \*555 E Ocean Blvd Suite 205  
>

<<https://www.google.com/maps/search/555+E+Ocean+Blvd+Suite+205+Long+Beach,+CA+90802?entry=3Dgmail&source=3Dg>>Long  
> Beach, CA 90802  
>  
<<https://www.google.com/maps/search/555+E+Ocean+Blvd+Suite+205+Long+Beach,+CA+90802?entry=3Dgmail&source=3Dg>>\*<br>\*<888>245-9393 <8882459393>\*<br>\*<a href="http://www.unitethepeople.org">http://www.unitethepeople.org/</a>\*<br>\*</div>

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<div dir=3D"auto">Millie,</div><div dir=3D"auto"><br></div><div dir=3D"auto=">Please see the attachments below. As they pertain the AG Response to Days= tar=E2=80=99s case.</div><div dir=3D"auto"><br></div><div dir=3D"auto">Let = me know if you have any questions or concerns.</div><div dir=3D"auto"><br><= /div><div dir=3D"auto">Blessings, Jaz=F0=9F=92=9A</div><div><br><div class= =3D"gmail\_quote"><div dir=3D"ltr" class=3D"gmail\_attr">----- Forwarded= message -----<br>From: <strong class=3D"gmail\_sendername" dir=3D"auto"= >Ceasar McDowell</strong> <span dir=3D"auto">&lt;<a href=3D"mailto:ceasar\_m= cdowell@unitethepeople.org">ceasar\_mcdowell@unitethepeople.org</a> &gt;</spa= n><br>Date: Sun, Aug 4, 2024 at 7:32 PM<br>Subject: Fwd: Daystar Peterson -= Atty General&#39;s Reply Brief<br>To: &lt;<a href=3D"mailto:jaz@unitethep= eople.org">jaz@unitethepeople.org</a>&gt;<br></div><br><br><div style=3D"zo= om:0%"><div dir=3D"auto"><br><br></div> <div dir=3D"auto">Get <a href=3D"https://bluemail.me" target=3D"\_blank">Blu= eMail for Android</a> </div> <div class=3D"gmail\_quote">On Jul 29, 2024, at 10:34=E2=80=AFAM, Cynthia De= Angelo &lt;<a href=3D"mailto:cynthia@unitethepeople.org" target=3D"\_blank">= cynthia@unitethepeople.org</a>&gt; wrote:<blockquote class=3D"gmail\_quote" = style=3D"margin:0pt 0pt 0pt 0.8ex;border-left-width:1px;border- left-style:s= olid;padding-left:1ex;border-left-color:rgb(204,204,204)"> <div dir=3D"ltr">Briefs attached.=C2=A0</div></blockquote></div> </div><div = style=3D"zoom:0%"><div class=3D"gmail\_quote"><blockquote

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File Oversized RB - Proposed ORD.pdf"
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Content-Disposition: attachment; filename="Peterson\_AG's Respondent's Brief.pdf"

Content-Transfer-Encoding: base64

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# **EXHIBIT 82-B**

**Transcription**

**Excerpt from Pete\_0001167**

**'Not Like Us' Easter Eggs | Keith Lee Effect Worn Off? | 'Megan' 30 Million Filtered Streams!**

**(7/5/2024)**

**Milagro Elizabeth Cooper:**

Everybody just has to do their job. So shout out to Unite the People - and let me actually pull up Unite the People's page because when anything happens with him, this is who you're gonna hear from - and then um obviously I'm in contact with them so you know I can get information from them and - and try to just get clarity on different things so that I can present that to you.



# **EXHIBIT 84-B**



Daystar Peterson & Ceasar McDowell Call  
October 30, 2024  
23:19:43 429378-545858981-10302024-231849-  
DCP\_007-367-5623550834-2003

1           AUTOMATED VOICE: Press one for -- two  
2           -- please enter your eight-digit key.  
3           (Indiscernible) number at the tone. Please enter  
4           your four-digit private code after the beep.  
5           This call will be recorded and monitored. Thank  
6           you for using Global Tel Link. Your call is  
7           being processed.

8           DAYSTAR PETERSON: Hello.

9           AUTOMATED VOICE: This is Global Tel  
10          Link. You have a prepaid call from Tory, an  
11          incarcerated individual at the California  
12          Correctional Institution, Tehachapi, California.  
13          This call and your telephone number will be  
14          monitored and recorded. You have a prepaid call.  
15          You will not be charged for this call. To accept  
16          this call, say or dial five now.

17          DAYSTAR PETERSON: Hello? Hello?

18          CEASAR MCDOWELL: Yeah.

19          DAYSTAR PETERSON: Yes.

20          CEASAR MCDOWELL: Well, yeah, but  
21          anyway, I know (indiscernible) but just -- you've  
22          got to remember --

23          DAYSTAR PETERSON: (Indiscernible)  
24          shit, bro. This is like, for some  
25          (indiscernible). Nah, bro. That ain't it.

1 CEASAR MCDOWELL: Yeah, some homeless  
2 niggas that are on medication. These niggas over  
3 there. Well, these niggas are over there,  
4 (indiscernible), yeah, these niggas need to  
5 change that.

6 DAYSTAR PETERSON: Yeah, for sure.

7 CEASAR MCDOWELL: Can you dig? But, on  
8 that one thing that we talked about. We really  
9 need to call -- did you send us -- you haven't  
10 sent us the paperwork because you changed  
11 buildings. But you need to send us that  
12 paperwork, nigger, so we can get ahead of that.

13 DAYSTAR PETERSON: Which paperwork?  
14 Oh. Is there any way that we can send somebody  
15 up there to get it? I know it's kind of far,  
16 but, yeah, (indiscernible) something in my mail,  
17 bro. I just know it, bro. It's not going to get  
18 to you, dog. And it's not even just that.

19 What I was going to tell you is, all  
20 three of those write-ups, all three of those  
21 write-ups -- oh, it's good that you're on the  
22 phone. All three of those write-ups are their  
23 final decision at Sacramento.

24 So, at this point, like I -- if you  
25 want -- niggas want to try to go -- I mean, just

1 because we're already going at it, niggas want to  
2 try to go for fucking all three write-ups, nigga,  
3 I -- it's -- I'll be -- I'll double it. You feel  
4 me? Like, whatever I was saying before, I'll  
5 just double it.

6 CEASAR MCDOWELL: Well, I'm not trying  
7 to charge you for all of that, bro.

8 DAYSTAR PETERSON: I know, but it's the  
9 amount of work that it may take. You know what  
10 I'm saying?

11 CEASAR MCDOWELL: Yeah, I know. I get  
12 that.

13 DAYSTAR PETERSON: I (indiscernible)  
14 have to actually go up to court, and drive up  
15 here and all this other extra shit. It's just  
16 like, I don't know if that's how it works, but  
17 I'm just saying. Or maybe it's just that --

18 CEASAR MCDOWELL: You know, the write-  
19 ups, everything that we're going to have to drive  
20 up there on and take to Louisville, we already  
21 had a meeting on it today, right? And the first  
22 thing we're going to do is, I'm going to take my  
23 (indiscernible) the squad. So, we're going to  
24 attack all of these write-ups. We'll attack them  
25 all for you. But we was focused on that one,



1 right?

2 DAYSTAR PETERSON: Yeah.

3 CEASAR MCDOWELL: And then, get the --  
4 because ain't no lawyer's going to know what  
5 these niggas know. Right?

6 DAYSTAR PETERSON: Yeah.

7 CEASAR MCDOWELL: So then, we going to  
8 get the whole plan mapped out. Then, we going to  
9 call the lawyer in. Okay, listen, this is what  
10 we doing. We're going to talk to you first,  
11 bleh, bleh, bleh, bleh, bleh. We'll call the  
12 lawyer in. Okay, this is the plan. This is what  
13 we going to do.

14 And we going to need the motherfuckers  
15 to drive up to the DA's Office, all of that shit,  
16 and make the motherfucker -- we'll do all that  
17 shit. You dig? And then --

18 DAYSTAR PETERSON: Mm hmm.

19 CEASAR MCDOWELL: -- if you want to --  
20 I don't want you to double it because I just --  
21 I'm not -- I hate how niggas nickel and dime you,  
22 and I'm never trying to be one of them niggas.

23 DAYSTAR PETERSON: Yeah, I only do it  
24 because I know that -- I know -- the reason why I  
25 pay for shit like that is because I just know

1 that like, I know that niggas need -- I know  
2 you're trying to be your (indiscernible) company,  
3 bro. But it's not about you all the time. I  
4 know that sometimes you got to use it for your  
5 own well-being, too, at the end of the day, bro.

6 This is not about you, bro. It's about  
7 the company. Like, that's why I start these  
8 things. It's not -- like, even with your hand to  
9 God, (indiscernible), it's not so much -- more so  
10 about, you know, just the fact that niggas was  
11 just like, all right, you know, we can get these  
12 niggas in, and that's kind of tight, that we're  
13 doing something for prisoners.

14 It's not that. It's just like, it's  
15 the fact that like, yo, we are doing something  
16 that is revolutionary, and this company is the  
17 first company to ever do it. And it's just like,  
18 the story's just so crazy, like, imagine we shoot  
19 a movie on your life, nigga. And it's just like,  
20 from (indiscernible) this and knowing me, to this  
21 (indiscernible) David and Goliath and we're  
22 pulling at Goliath, nigga.

23 And it's just like, we're all just  
24 coming with it. Like, you know what I'm saying?  
25 Like, it's like, I'm getting the information

1 sometimes and I'm feeding it to you. And then  
2 you're running quarterback with the fucking --  
3 with the law shit that you've been doing.

4 And you've got the (indiscernible) in  
5 the media when you need to do the media. It's  
6 just like, you know what I'm saying, this shit is  
7 factual, of course. And just getting it out  
8 there. Getting our relationships and getting  
9 people to -- that awareness for it, right? And  
10 it's just like, yo bro, like, it's just --

11 AUTOMATED VOICE: This call and your  
12 telephone number will be monitored and recorded.

13 DAYSTAR PETERSON: (Indiscernible)  
14 really be (indiscernible) --

15 CEASAR MCDOWELL: Yeah, can you hear  
16 me?

17 DAYSTAR PETERSON: Yeah.

18 CEASAR MCDOWELL: Let me read you -- we  
19 finished the statement for the media tomorrow.

20 DAYSTAR PETERSON: I (indiscernible) --

21 CEASAR MCDOWELL: I'm wondering --

22 DAYSTAR PETERSON: Let me hear it.

23 CEASAR MCDOWELL: Let me read it to  
24 you. So, it says, Unite the People, Inc. agrees  
25 to represent -- this is the media release for

1 tomorrow. Unite the People, Inc. agrees to  
2 represent Milagro Cooper against threats and  
3 intimidation targeting influencers for expressing  
4 their opinions in the civil matter filed by the  
5 now Claimant Megan Pete. Right?

6 It says - that's in the headline,  
7 (indiscernible). There is a recent filing for  
8 Megan Pete, an individual Plaintiff, whose name  
9 is Milagro Elizabeth Cooper, an individual as a  
10 Defendant.

11 Unite the People, Inc. is a nonprofit  
12 law firm that promotes social justice throughout  
13 the United States as well as provide affordable  
14 legal services to the underserved community, as  
15 well as multiple other services, i.e. mentoring  
16 programs for the disadvantaged youth, empowering  
17 young women, mentoring programs, assisting the  
18 homeless, veterans, transitional housing, etc.,  
19 right?

20 It just tells a little bit about the  
21 company, right? And then it says, Milagro  
22 Elizabeth Cooper has been served a lawsuit making  
23 a lot of false claims against her professional  
24 conduct in an attempt to stop her from reporting  
25 on Daystar Peterson, aka Tory Lanez's case,



1 because in their lawsuit, that's all they talk  
2 about is your case and what Milagro says on your  
3 behalf, right?

4 DAYSTAR PETERSON: Yeah.

5 CEASAR MCDOWELL: They said that -- all  
6 kinds of shit, right? But I'm going to run  
7 through this real quick. Unite the People, Inc.  
8 was founded and exists to fight on behalf of the  
9 disadvantaged, the small and the powerless,  
10 against these Goliath organizations, corporations  
11 or celebrities that want to push around and bully  
12 the Davids of the world, i.e., the people.

13 Unite the People, Inc. will not stand  
14 by and let an intractable justice system or a  
15 billion-dollar corporation led by popular  
16 celebrities take advantage of the small guy in an  
17 attempt to silence someone from their First  
18 Amendment right of freedom of speech.

19 Unite the People, Inc. has agreed to  
20 take on the defense of Milagro Cooper, as well as  
21 any other social media influencer, journalism  
22 platform, journalist, podcast or reporter of any  
23 type that has received this lawsuit against them  
24 or any other form of bullying/harassment to  
25 silence them from their right of freedom of

1 speech.

2 Any such influencer, media person or  
3 organization who has been or received a threat,  
4 an attempt to silence them from the same  
5 organization or corporation should contact Unite  
6 the People, Inc. immediately.

7 DAYSTAR PETERSON: So, is this a  
8 statement or is this a -- because it sounds like  
9 two things are going on. It sounds like you're  
10 saying like -- it sounds like you're saying, yo,  
11 we're representing Milagro, these are the things,  
12 these are the facts, this is the basis. And  
13 then, you're saying, but if anybody else needs  
14 it, like, what is it? Is this a -- like, what is  
15 this? (Indiscernible) --

16 CEASAR MCDOWELL: So, what  
17 (indiscernible) -- it's a statement, right? What  
18 they're doing is -- we're putting out a statement  
19 saying that we're representing Milagro. It's a  
20 two-pronged thing. We're putting out a statement  
21 saying that we're representing Milagro. But  
22 then, we're also stating that anybody else can --  
23 because you know they're targeting more people  
24 than just her. It was quite a few people that  
25 they're targeting, right?

1 DAYSTAR PETERSON: Yeah --

2 CEASAR MCDOWELL: And so, we're putting  
3 out a statement saying any of the rest of you  
4 guys that are being targeted by this, if you need  
5 assistance, contact us as well.

6 DAYSTAR PETERSON: Yeah, for sure. For  
7 sure.

8 CEASAR MCDOWELL: Do you get what I'm  
9 saying?

10 DAYSTAR PETERSON: Yeah, I get it. I  
11 get it. I get it. So, what time are you guys  
12 going to post the (indiscernible) up?

13 CEASAR MCDOWELL: Probably first thing  
14 in the morning. (indiscernible) told me to post  
15 it to my Instagram first, to the Unite the People  
16 Instagram. And she said, post it early and then  
17 she'll send it over to TMZ. And I guess whoever  
18 else. There's a bunch of people -- Rolling Stone  
19 --

20 DAYSTAR PETERSON: (indiscernible) --

21 CEASAR MCDOWELL: What's that?

22 DAYSTAR PETERSON: (indiscernible) was  
23 telling me like, yeah, I don't know if we should  
24 put the Milagro part in because --

25 AUTOMATED VOICE: This call and your

1 telephone number will be monitored and recorded.

2 DAYSTAR PETERSON: If he should say  
3 that out publicly, (indiscernible). He should  
4 say that out publicly because at the end of the  
5 day, he, like -- because she's saying I'm a part  
6 of the Board of Advisory, so isn't that a  
7 conflict of interest?

8 CEASAR MCDOWELL: No. You're not --  
9 you're not -- you're not -- this is a thing where  
10 --

11 DAYSTAR PETERSON: (Indiscernible) --

12 CEASAR MCDOWELL: -- Megan is suing  
13 Milagro, right?

14 DAYSTAR PETERSON: Yeah.

15 CEASAR MCDOWELL: That don't have --  
16 you're done with Megan. It's Daystar Peterson  
17 against the Attorney General's Office and the  
18 Appellate Courts. That's why we said, why the  
19 fuck was her lawyer even speaking up. She has  
20 nothing to do with this no more. Do you dig what  
21 I'm saying?

22 DAYSTAR PETERSON: Yeah.

23 CEASAR MCDOWELL: The only conflict of  
24 interest would be if Milagro didn't know we had  
25 represented you. You dig what I'm saying? But -



1 -

2 DAYSTAR PETERSON: Okay.

3 CEASAR MCDOWELL: -- it don't have  
4 nothing to do with you no more. What  
5 (indiscernible) was saying was -- and you know, I  
6 love (indiscernible), but she will hesitate on a  
7 lot of this shit. Right? Not even talking about  
8 this shit.

9 DAYSTAR PETERSON: (Indiscernible) --

10 CEASAR MCDOWELL: -- this shit, like  
11 she was like, yo, I think we should wait before  
12 we do this and et cetera. Hello? Tory? Damn,  
13 that shit cut off like exactly at 11:30. Hello?  
14 Hello?

15

16

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25

C E R T I F I C A T I O N

I, Sonya Ledanski Hyde, certify that the foregoing transcript is a true and accurate record of the proceedings.

*Sonya M. Ledanski Hyde*

Veritext Legal Solutions  
330 Old Country Road  
Suite 300  
Mineola, NY 11501

Date: January 7, 2025

[& - daystar]

<b>&amp;</b>	<b>ahead</b> 3:12	<b>bunch</b> 11:18	<b>company</b> 6:2,7
<b>&amp;</b> 1:12	<b>ain't</b> 2:25 5:4	<b>c</b>	6:16,17 8:21
<b>0</b>	<b>aka</b> 8:25	<b>c</b> 14:1,1	<b>conduct</b> 8:24
<b>007-367-562...</b>	<b>amendment</b>	<b>california</b> 2:11	<b>conflict</b> 12:7,23
1:15	9:18	2:12	<b>contact</b> 10:5
<b>1</b>	<b>amount</b> 4:9	<b>call</b> 1:12 2:5,6	11:5
<b>11501</b> 14:14	<b>anybody</b> 10:13	2:10,13,14,15	<b>cooper</b> 8:2,9,22
<b>11:30</b> 13:13	10:22	2:16 3:9 5:9,11	9:20
<b>12151</b> 14:9	<b>anyway</b> 2:21	7:11 11:25	<b>corporation</b>
<b>2</b>	<b>appellate</b> 12:18	<b>case</b> 8:25 9:2	9:15 10:5
<b>2024</b> 1:13	<b>assistance</b> 11:5	<b>ceasar</b> 1:12	<b>corporations</b>
<b>2025</b> 14:16	<b>assisting</b> 8:17	2:18,20 3:1,7	9:10
<b>23:19:43</b> 1:14	<b>attack</b> 4:24,24	4:6,11,18 5:3,7	<b>correctional</b>
<b>3</b>	<b>attempt</b> 8:24	5:19 7:15,18	2:12
<b>30</b> 1:13	9:17 10:4	7:21,23 9:5	<b>country</b> 14:12
<b>300</b> 14:13	<b>attorney</b> 12:17	10:16 11:2,8	<b>course</b> 7:7
<b>330</b> 14:12	<b>automated</b> 2:1	11:13,21 12:8	<b>court</b> 4:14
<b>4</b>	2:9 7:11 11:25	12:12,15,23	<b>courts</b> 12:18
<b>429378-5458...</b>	<b>awareness</b> 7:9	13:3,10	<b>crazy</b> 6:18
1:14	<b>b</b>	<b>celebrities</b> 9:11	<b>cut</b> 13:13
<b>7</b>	<b>basis</b> 10:12	9:16	<b>d</b>
<b>7</b> 14:16	<b>beep</b> 2:4	<b>certify</b> 14:3	<b>da's</b> 5:15
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[daystar - key]

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[powerless - thing]

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# **EXHIBIT 85-B**



**Transcription**

**Excerpt from Pete\_0001167**

**'Not Like Us' Easter Eggs | Keith Lee Effect Worn Off? | 'Megan' 30 Million Filtered Streams!**

**(7/5/2024)**

**Milagro Elizabeth Cooper:**

Everybody just has to do their job. So shout out to Unite the People - and let me actually pull up Unite the People's page because when anything happens with him, this is who you're gonna hear from - and then um obviously I'm in contact with them so you know I can get information from them and - and try to just get clarity on different things so that I can present that to you.

So let me like this post from this page. So this is the actual form that was filed on July 2nd and you can see that it says 745 motion granted for Mr. Peterson and so it says the court has read and considered petitioner Daystar Peterson's June 21st 2024 motion for Relevant evidence brought pursuant to penal code section 745 subdivision D.

# **EXHIBIT 86**

ITS Media Export

Date/Time:(Generated) 12/17/2024 7:42:22 AM

Search Criteria

From(Start Date/Time):	10/9/2023 12:00:00 AM
To (End Date/Time):	12/17/2024 11:59:00 PM
User ID:	gsalinas
Duration:	From : 0 To : 0
Facility:	All
Living Unit:	
Stations:	
Completion Codes:	Completed Call
Tracking #:	
Recorded:	All
Monitored:	All
Transaction Type:	All
3 Way Call:	All
Rate Type:	All
Alerted:	All
Alert Group:	
Accessed:	All
Protected:	All
Telephone Type:	All
Exported:	All
Destination Number:	5623550834
Inmate :	bw0168
Workstation ID:	HOUCADOCIIS1

ITS Media Export

Date/Time:(Generated) 12/17/2024 7:42:22 AM

#	Site Code	Living Unit	Date Time	Inmate ID	Inmate Name	Destination	Duration	File Name
1	CCI	MAIN	10/15/2023 16:42:02	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	12	429378-427895653-10152023-164044-DCP_016-153-5623550834-2003.V24
2	CCI	MAIN	10/24/2023 09:55:42	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	15	429378-430834863-10242023-095447-DCP_007-186-5623550834-2003.V24
3	CCI	MAIN	10/24/2023 10:11:38	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	1	429378-430838629-10242023-101039-DCP_025-222-5623550834-2003.V24
4	CCI	MAIN	10/24/2023 10:13:23	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	10	429378-430839127-10242023-101237-DCP_008-350-5623550834-2003.V24
5	CCI	MAIN	10/31/2023 18:41:14	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	3	429378-433351421-10312023-184010-DCP_009-035-5623550834-2003.V24
6	CCI	MAIN	10/31/2023 18:45:49	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	15	429378-433353809-10312023-184438-DCP_008-171-5623550834-2003.V24
7	CCI	MAIN	11/01/2023 14:26:52	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	9	429378-433565147-11012023-142546-DCP_008-303-5623550834-2003.V24
8	CCI	MAIN	11/14/2023 13:10:56	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	13	429378-437697541-11142023-131001-DCP_009-226-5623550834-2003.V24
9	CCI	MAIN	11/14/2023 15:03:25	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	1	429378-437730137-11142023-150226-DCP_007-121-5623550834-2003.V24
10	CCI	MAIN	11/15/2023 10:24:22	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	15	429378-437957171-11152023-102307-DCP_025-317-5623550834-2003.V24
11	CCI	MAIN	11/15/2023 10:40:40	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	3	429378-437961219-11152023-103934-DCP_018-188-5623550834-2003.V24
12	CCI	MAIN	11/15/2023 10:47:41	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	6	429378-437962931-11152023-104650-DCP_008-185-5623550834-2003.V24
13	CCI	MAIN	11/15/2023 10:54:31	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	15	429378-437964607-11152023-105347-DCP_016-251-5623550834-2003.V24
14	CCI	MAIN	11/15/2023 11:09:57	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	15	429378-437968341-11152023-110905-DCP_018-148-5623550834-2003.V24
15	CCI	MAIN	11/15/2023 11:26:38	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	4	429378-437971921-11152023-112541-DCP_009-051-5623550834-2003.V24

ITS Media Export

Date/Time:(Generated) 12/17/2024 7:42:22 AM

Report Site: Dept of Corr HQ

#	Site Code	Living Unit	Date Time	Inmate ID	Inmate Name	Destination	Duration	File Name
16	CCI	MAIN	12/05/2023 13:35:24	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	1	429378-444470327-12052023-133407-DCP_009-394-5623550834-2003.V24
17	CCI	MAIN	12/05/2023 13:41:23	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	15	429378-444472179-12052023-134037-DCP_018-027-5623550834-2003.V24
18	CCI	MAIN	12/05/2023 14:00:10	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	2	429378-444477489-12052023-135905-DCP_009-391-5623550834-2003.V24
19	CCI	MAIN	12/17/2023 08:41:55	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	15	429378-448169631-12172023-084104-DCP_007-311-5623550834-2003.V24
20	CCI	MAIN	12/17/2023 08:58:22	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	5	429378-448173365-12172023-085737-DCP_007-023-5623550834-2003.V24
21	CCI	MAIN	12/22/2023 11:15:42	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	5	429378-449808439-12222023-111447-DCP_007-219-5623550834-2003.V24
22	CCI	MAIN	12/31/2023 16:46:21	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	12	429378-452974905-12312023-164521-DCP_016-136-5623550834-2003.V24
23	CCI	MAIN	03/01/2024 15:18:12	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	14	429378-472399269-03012024-151721-DCP_009-214-5623550834-2003.V24
24	CCI	MAIN	03/11/2024 14:46:07	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	15	429378-475641583-03112024-144514-DCP_008-225-5623550834-2003.V24
25	CCI	MAIN	03/11/2024 15:03:04	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	7	429378-475647003-03112024-150203-DCP_009-124-5623550834-2003.V24
26	CCI	MAIN	03/11/2024 15:11:10	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	15	429378-475649893-03112024-151018-DCP_018-224-5623550834-2003.V24
27	CCI	MAIN	03/14/2024 13:48:10	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	7	429378-476527683-03142024-134651-DCP_025-311-5623550834-2003.V24
28	CCI	MAIN	03/14/2024 13:55:52	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	15	429378-476529719-03142024-135449-DCP_018-285-5623550834-2003.V24
29	CCI	MAIN	03/14/2024 14:12:14	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	7	429378-476534307-03142024-141123-DCP_016-150-5623550834-2003.V24
30	CCI	MAIN	07/28/2024 15:26:08	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	15	429378-517902601-07282024-152515-DCP_025-151-5623550834-2003.V24

User ID: gsalinas

Workstation ID: HOUCADOCIIS1

ITS Media Export

Date/Time:(Generated) 12/17/2024 7:42:22 AM

#	Site Code	Living Unit	Date Time	Inmate ID	Inmate Name	Destination	Duration	File Name
31	CCI	MAIN	07/28/2024 15:42:12	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	15	429378-517908849-07282024-154123-DCP_007-297-5623550834-2003.V24
32	CCI	MAIN	08/23/2024 21:12:40	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	15	429378-525518809-08232024-211143-DCP_018-229-5623550834-2003.V24
33	CCI	MAIN	08/23/2024 21:46:29	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	15	429378-525533061-08232024-214534-DCP_009-230-5623550834-2003.V24
34	CCI	MAIN	08/23/2024 22:02:57	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	15	429378-525539121-08232024-220201-DCP_018-285-5623550834-2003.V24
35	CCI	MAIN	08/29/2024 18:01:18	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	3	429378-527270155-08292024-180024-DCP_016-088-5623550834-2003.V24
36	CCI	MAIN	09/10/2024 22:23:20	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	15	429378-531026821-09102024-222227-DCP_009-104-5623550834-2003.V24
37	CCI	MAIN	09/10/2024 22:39:49	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	5	429378-531031725-09102024-223850-DCP_016-277-5623550834-2003.V24
38	CCI	MAIN	09/12/2024 14:27:27	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	3	429378-531417541-09122024-142639-DCP_016-125-5623550834-2003.V24
39	CCI	MAIN	09/25/2024 20:24:29	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	15	429378-535250065-09252024-202344-DCP_009-098-5623550834-2003.V24
40	CCI	MAIN	09/25/2024 20:41:25	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	15	429378-535257487-09252024-204035-DCP_016-333-5623550834-2003.V24
41	CCI	MAIN	09/30/2024 19:57:41	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	14	429378-536792435-09302024-195645-DCP_008-391-5623550834-2003.V24
42	CCI	MAIN	10/02/2024 13:10:26	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	1	429378-537240147-10022024-130927-DCP_018-142-5623550834-2003.V24
43	CCI	MAIN	10/03/2024 10:56:25	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	15	429378-537498535-10032024-105459-DCP_016-025-5623550834-2003.V24
44	CCI	MAIN	10/03/2024 12:05:08	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	9	429378-537515841-10032024-120404-DCP_016-209-5623550834-2003.V24
45	CCI	MAIN	10/10/2024 21:59:01	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	15	429378-539814315-10102024-215808-DCP_016-329-5623550834-2003.V24

ITS Media Export

Date/Time:(Generated) 12/17/2024 7:42:22 AM

#	Site Code	Living Unit	Date Time	Inmate ID	Inmate Name	Destination	Duration	File Name
46	CCI	MAIN	10/10/2024 22:15:40	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	15	429378-539819661-10102024-221447-DCP_008-173-5623550834-2003.V24
47	CCI	MAIN	10/10/2024 22:32:08	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	15	429378-539824323-10102024-223112-DCP_016-262-5623550834-2003.V24
48	CCI	MAIN	10/10/2024 22:48:31	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	15	429378-539828669-10102024-224743-DCP_016-062-5623550834-2003.V24
49	CCI	MAIN	10/10/2024 23:03:55	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	15	429378-539831639-10102024-230307-DCP_008-287-5623550834-2003.V24
50	CCI	MAIN	10/13/2024 20:49:03	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	15	429378-540729237-10132024-204802-DCP_018-135-5623550834-2003.V24
51	CCI	MAIN	10/29/2024 10:47:41	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	5	429378-545320533-10292024-104649-DCP_009-353-5623550834-2003.V24
52	CCI	MAIN	10/29/2024 10:55:43	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	15	429378-545322389-10292024-105455-DCP_009-346-5623550834-2003.V24
53	CCI	MAIN	10/29/2024 11:11:19	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	15	429378-545326245-10292024-111030-DCP_025-161-5623550834-2003.V24
54	CCI	MAIN	10/29/2024 11:27:23	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	5	429378-545330405-10292024-112635-DCP_007-028-5623550834-2003.V24
55	CCI	MAIN	10/30/2024 23:03:38	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	15	429378-545858451-10302024-230252-DCP_007-318-5623550834-2003.V24
56	CCI	MAIN	10/30/2024 23:19:43	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	12	429378-545858981-10302024-231849-DCP_007-367-5623550834-2003.V24
57	CCI	MAIN	11/01/2024 09:19:46	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	4	429378-546193575-11012024-091857-DCP_025-327-5623550834-2003.V24
58	CCI	MAIN	11/01/2024 09:24:57	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	15	429378-546194605-11012024-092357-DCP_018-226-5623550834-2003.V24
59	CCI	MAIN	11/01/2024 09:42:35	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	15	429378-546198331-11012024-094144-DCP_025-025-5623550834-2003.V24
60	CCI	MAIN	11/01/2024 23:12:30	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	15	429378-546481079-11012024-231138-DCP_018-057-5623550834-2003.V24

ITS Media Export

Date/Time:(Generated) 12/17/2024 7:42:22 AM

#	Site Code	Living Unit	Date Time	Inmate ID	Inmate Name	Destination	Duration	File Name
61	CCI	MAIN	11/02/2024 22:18:40	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	15	429378-546797945-11022024-221723-DCP_025-165-5623550834-2003.V24
62	CCI	MAIN	11/02/2024 22:35:19	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	15	429378-546803135-11022024-223424-DCP_025-322-5623550834-2003.V24
63	CCI	MAIN	11/02/2024 22:51:02	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	10	429378-546807573-11022024-225009-DCP_007-210-5623550834-2003.V24
64	CCI	MAIN	11/02/2024 23:01:57	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	15	429378-546809917-11022024-230104-DCP_008-193-5623550834-2003.V24
65	CCI	MAIN	11/07/2024 10:08:45	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	15	429378-548005961-11072024-100749-DCP_016-098-5623550834-2003.V24
66	CCI	MAIN	11/07/2024 15:12:48	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	15	429378-548091543-11072024-151147-DCP_008-076-5623550834-2003.V24
67	CCI	MAIN	11/07/2024 15:30:02	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	15	429378-548098139-11072024-152918-DCP_018-163-5623550834-2003.V24
68	CCI	MAIN	11/07/2024 16:01:52	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	15	429378-548109891-11072024-160058-DCP_018-194-5623550834-2003.V24
69	CCI	MAIN	11/07/2024 16:19:13	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	13	429378-548116385-11072024-161817-DCP_009-372-5623550834-2003.V24
70	CCI	MAIN	11/08/2024 21:43:11	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	15	429378-548567345-11082024-214219-DCP_009-216-5623550834-2003.V24
71	CCI	MAIN	11/09/2024 15:55:29	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	3	429378-548748747-11092024-155440-DCP_016-269-5623550834-2003.V24
72	CCI	MAIN	11/09/2024 21:49:11	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	12	429378-548895991-11092024-214808-DCP_008-148-5623550834-2003.V24
73	CCI	MAIN	11/15/2024 16:18:35	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	12	429378-550586505-11152024-161747-DCP_016-082-5623550834-2003.V24
74	CCI	MAIN	11/15/2024 19:12:26	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	15	429378-550656891-11152024-191131-DCP_007-225-5623550834-2003.V24
75	CCI	MAIN	11/15/2024 19:28:41	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	15	429378-550665429-11152024-192743-DCP_016-270-5623550834-2003.V24



ITS Media Export

Date/Time:(Generated) 12/17/2024 7:42:22 AM

Report Site: Dept of Corr HQ

#	Site Code	Living Unit	Date Time	Inmate ID	Inmate Name	Destination	Duration	File Name
76	CCI	MAIN	11/15/2024 19:45:00	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	5	429378-550673651-11152024-194358-DCP_009-020-5623550834-2003.V24
77	CCI	MAIN	11/17/2024 20:50:45	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	10	429378-551362471-11172024-204948-DCP_007-068-5623550834-2003.V24
78	CCI	MAIN	11/19/2024 21:17:38	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	15	429378-551965905-11192024-211622-DCP_009-238-5623550834-2003.V24
79	CCI	MAIN	11/19/2024 21:34:39	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	15	429378-551972667-11192024-213350-DCP_018-281-5623550834-2003.V24
80	CCI	MAIN	11/19/2024 21:51:13	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	15	429378-551978259-11192024-215012-DCP_009-154-5623550834-2003.V24
81	CCI	MAIN	11/19/2024 22:07:42	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	15	429378-551983357-11192024-220639-DCP_018-241-5623550834-2003.V24
82	CCI	MAIN	11/19/2024 22:23:26	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	15	429378-551987913-11192024-222226-DCP_009-228-5623550834-2003.V24
83	CCI	MAIN	11/19/2024 22:39:41	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	15	429378-551992223-11192024-223849-DCP_018-016-5623550834-2003.V24
84	CCI	MAIN	11/20/2024 13:46:29	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	2	429378-552089481-11202024-134539-DCP_007-211-5623550834-2003.V24
85	CCI	MAIN	11/20/2024 15:14:02	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	15	429378-552114691-11202024-151303-DCP_008-250-5623550834-2003.V24
86	CCI	MAIN	11/20/2024 15:30:07	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	8	429378-552120241-11202024-152918-DCP_018-011-5623550834-2003.V24
87	CCI	MAIN	11/20/2024 18:24:13	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	15	429378-552178437-11202024-182312-DCP_016-255-5623550834-2003.V24
88	CCI	MAIN	11/20/2024 18:41:13	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	15	429378-552186815-11202024-184011-DCP_009-006-5623550834-2003.V24
89	CCI	MAIN	11/21/2024 10:44:28	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	15	429378-552336401-11212024-104327-DCP_016-027-5623550834-2003.V24
90	CCI	MAIN	11/21/2024 11:02:07	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	15	429378-552340261-11212024-110108-DCP_009-343-5623550834-2003.V24

User ID: gsalinas

Workstation ID: HOUCADOCIIS1

ITS Media Export

Date/Time:(Generated) 12/17/2024 7:42:22 AM

#	Site Code	Living Unit	Date Time	Inmate ID	Inmate Name	Destination	Duration	File Name
91	CCI	MAIN	11/22/2024 19:28:52	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	2	429378-552804169-11222024-192744-DCP_016-218-5623550834-2003.V24
92	CCI	MAIN	11/22/2024 19:33:43	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	11	429378-552806759-11222024-193253-DCP_016-098-5623550834-2003.V24
93	CCI	MAIN	11/26/2024 09:58:23	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	15	429378-553885107-11262024-095726-DCP_016-129-5623550834-2003.V24
94	CCI	MAIN	11/26/2024 10:15:40	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	15	429378-553889119-11262024-101451-DCP_008-097-5623550834-2003.V24
95	CCI	MAIN	12/04/2024 09:06:47	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	15	429378-556519759-12042024-090551-DCP_016-207-5623550834-2003.V24
96	CCI	MAIN	12/04/2024 09:22:54	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	15	429378-556522639-12042024-092208-DCP_016-296-5623550834-2003.V24
97	CCI	MAIN	12/05/2024 19:08:50	BW0168	PETERSON, DAYSTAR	562 - 355 - 0834	2	429378-556994737-12052024-190746-DCP_008-377-5623550834-2003.V24

Total Records : 97

# **EXHIBIT 87**



4205016.001  
03/23/2025

AT&T has queried for records from 10/08/2020 12:00:00am to 03/17/2025 11:59:59pm  
AT&T has queried for records using Eastern Time Zone. AT&T's records are stored and provided in UTC.

C. MCDOWELL  
07.25.25

**Exhibit 87**

RONNY ZAVOSKY

Run Date: 03/23/2025  
Run Time: 09:17:33  
Voice Usage For: (281)640-4536, (562)355-0834

Item	Conn. Date	Conn. Time (UTC)	Seizure Time	ET	Originating Number	Terminating Number	IMEI	IMSI	CT	Feature
1	10/31/24	00:31:36	0:04	13:27	15623550834	12816404536	35168257631221 APPLE IPHONE15	310280113409542	MT	[Wi-Fi:NIOP]
2	10/31/24	02:19:06	0:01	0:02	15623550834	12816404536	35168257631221 APPLE IPHONE15	310280113409542	MT	[NIOP]
3	10/31/24	02:19:11	0:01	0:03	15623550834	12816404536	35168257631221 APPLE IPHONE15	310280113409542	MT	[NIOP]
4	10/31/24	13:58:59	0:01	0:02	15623550834	12816404536	35168257631221 APPLE IPHONE15	310280113409542	MT	[Wi-Fi:NIOP]
5	10/31/24	13:59:04	0:01	0:04	15623550834	12816404536	35168257631221 APPLE IPHONE15	310280113409542	MT	[Wi-Fi:NIOP]
6	10/31/24	14:51:58	0:10	8:11	12816404536	15623550834	35168257631221 APPLE IPHONE15	310280113409542	MO	[Wi-Fi]
7	10/31/24	21:27:59	0:04	4:19	15623550834	12816404536	35168257631221 APPLE IPHONE15	310280113409542	MT	[NIOP]
8	10/31/24	21:52:16	0:02	0:04	12816404536	15623550834	35168257631221 APPLE IPHONE15	310280113409542	MO	[ ]
9	10/31/24	21:52:36	0:15	0:58	12816404536	15623550834	35168257631221 APPLE IPHONE15	310280113409542	MO	[ ]
10	11/01/24	03:24:18	0:10	0:25	15623550834	12816404536	35168257631221 APPLE IPHONE15	310280113409542	MT	[Wi-Fi:NIOP]
11	11/01/24	21:01:10	0:12	1:41	15623550834	12816404536	35168257631221 APPLE IPHONE15	310280113409542	MT	[Wi-Fi:NIOP]
12	11/01/24	21:03:32	0:03	21:46	15623550834	12816404536	35168257631221 APPLE IPHONE15	310280113409542	MT	[Wi-Fi:NIOP:CMW]
13	11/02/24	21:07:36	0:05	1:36	15623550834	12816404536	35168257631221 APPLE IPHONE15	310280113409542	MT	[Wi-Fi:NIOP]
14	11/07/24	19:19:59	0:01	0:02	15623550834	12816404536	35168257631221 APPLE IPHONE15	310280113409542	MT	[NIOP]

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Page 1

4205016.001  
03/23/2025

AT&T has queried for records from 10/08/2020 12:00:00am to 03/17/2025 11:59:59pm  
AT&T has queried for records using Eastern Time Zone. AT&T's records are stored and provided in UTC.

Run Date: 03/23/2025  
Run Time: 09:17:33  
Voice Usage For: (281)640-4536, (562)355-0834

Item	Conn. Date	Conn. Time (UTC)	Seizure Time	ET	Originating Number	Terminating Number	IMEI	IMSI	CT	Feature
15	11/07/24	19:20:05	0:02	0:02	15623550834	12816404536	35168257631221 APPLE IPHONE15	310280113409542	MT	[NIOP]
16	11/07/24	19:20:18	0:02	0:02	15623550834	12816404536	35168257631221 APPLE IPHONE15	310280113409542	MT	[NIOP]
17	11/07/24	19:31:06	0:18	0:01	12816404536	15623550834	35168257631221 APPLE IPHONE15	310280113409542	MO	[Wi-Fi]
18	11/07/24	19:31:14	0:05	0:00	12816404536	15623550834	35168257631221 APPLE IPHONE15	310280113409542	MO	[Wi-Fi]
19	11/07/24	22:29:55	0:15	0:36	12816404536	15623550834	35168257631221 APPLE IPHONE15	310280113409542	MO	[ ]
20	11/07/24	22:30:31	0:00	1:27	12816404536	15623550834	35168257631221 APPLE IPHONE15	310280113409542	MO	[Wi-Fi]
21	11/08/24	21:12:52	0:07	1:42	12816404536	15623550834	35168257631221 APPLE IPHONE15	310280113409542	MO	[ ]
22	11/12/24	19:17:29	0:00	0:02	15623550834	12816404536	35168257631221 APPLE IPHONE15	310280113409542	MT	[Wi-Fi:NIOP]
23	11/12/24	19:17:33	0:00	0:02	15623550834	12816404536	35168257631221 APPLE IPHONE15	310280113409542	MT	[Wi-Fi:NIOP]
24	11/18/24	19:43:49	0:01	0:20	15623550834	12816404536	35168257631221 APPLE IPHONE15	310280113409542	MT	[Wi-Fi:NIOP]
25	11/18/24	19:44:37	0:13	0:02	12816404536	15623550834	35168257631221 APPLE IPHONE15	310280113409542	MO	[ ]
26	11/18/24	19:44:48	0:08	0:00	12816404536	15623550834	35168257631221 APPLE IPHONE15	310280113409542	MO	[ ]
27	11/18/24	19:45:23	0:02	0:03	12816404536	15623550834	35168257631221 APPLE IPHONE15	310280113409542	MO	[ ]
28	11/18/24	19:45:54	0:03	1:38	15623550834	12816404536	35168257631221 APPLE IPHONE15	310280113409542	MT	[NIOP]

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4205016.001  
03/23/2025

AT&T has queried for records from 10/08/2020 12:00:00am to 03/17/2025 11:59:59pm  
AT&T has queried for records using Eastern Time Zone. AT&T's records are stored and provided in UTC.

Run Date: 03/23/2025  
Run Time: 09:17:33  
Voice Usage For: (281)640-4536, (562)355-0834

Item	Conn. Date	Conn. Time (UTC)	Seizure Time	ET	Originating Number	Terminating Number	IMEI	IMSI	CT	Feature
29	11/20/24	00:17:29	0:06	2:43	15623550834	12816404536	35168257631221 APPLE IPHONE15	310280113409542	MT	[NIOP]
30	11/20/24	00:20:33	0:04	10:03	15623550834	12816404536	35168257631221 APPLE IPHONE15	310280113409542	MT	[NIOP]
31	11/22/24	20:54:56	0:00	0:00	15623550834	12816404536		310280113409542	MT	[NIOP]
32	11/22/24	20:54:57	0:01	0:02	15623550834 18324949000(F)	12816404536		310280113409542	MT	[NIOP:CFNR:VM]
33	11/22/24	20:55:01	0:00	0:00	15623550834	12816404536		310280113409542	MT	[NIOP]
34	11/22/24	20:55:02	0:01	0:02	15623550834 18324949000(F)	12816404536		310280113409542	MT	[NIOP:CFNR:VM]
35	11/22/24	20:55:07	0:01	0:00	15623550834	12816404536		310280113409542	MT	[NIOP]
36	11/22/24	20:55:08	0:02	0:02	15623550834 18324949000(F)	12816404536		310280113409542	MT	[NIOP:CFNR:VM]
37	11/22/24	21:26:16	0:08	1:27	15623550834	12816404536	35168257631221 APPLE IPHONE15	310280113409542	MT	[NIOP:CMW]
38	11/25/24	02:31:15	0:02	0:02	15623550834	12816404536	35168257631221 APPLE IPHONE15	310280113409542	MT	[NIOP]
39	11/25/24	02:31:20	0:01	0:01	15623550834	12816404536	35168257631221 APPLE IPHONE15	310280113409542	MT	[NIOP]
40	11/26/24	20:54:34	0:02	0:02	15623550834	12816404536	35168257631221 APPLE IPHONE15	310280113409542	MT	[NIOP]
41	11/26/24	20:54:39	0:01	0:03	15623550834	12816404536	35168257631221 APPLE IPHONE15	310280113409542	MT	[NIOP]
42	11/26/24	20:57:55	0:02	0:03	12816404536	15623550834	35168257631221 APPLE IPHONE15	310280113409542	MO	[ ]
43	11/26/24	21:50:28	0:07	4:11	15623550834	12816404536	35168257631221 APPLE IPHONE15	310280113409542	MT	[NIOP]
44	11/26/24	21:55:32	0:04	0:35	15623550834	12816404536	35168257631221 APPLE IPHONE15	310280113409542	MT	[NIOP]
45	12/12/24	19:28:42	0:01	0:03	15623550834	12816404536	35168257631221 APPLE IPHONE15	310280113409542	MT	[NIOP]

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4205016.001  
03/23/2025

AT&T has queried for records from 10/08/2020 12:00:00am to 03/17/2025 11:59:59pm  
AT&T has queried for records using Eastern Time Zone. AT&T's records are stored and provided in UTC.

Run Date: 03/23/2025  
Run Time: 09:17:33  
Voice Usage For: (281)640-4536, (562)355-0834

Item	Conn. Date	Conn. Time (UTC)	Seizure Time	ET	Originating Number	Terminating Number	IMEI	IMSI	CT	Feature
46	12/12/24	19:28:48	0:01	0:03	15623550834	12816404536	35168257631221 APPLE IPHONE15	310280113409542	MT	[NIOP]
47	12/12/24	19:29:02	0:01	0:01	15623550834	12816404536	35168257631221 APPLE IPHONE15	310280113409542	MT	[NIOP]
48	12/12/24	19:29:07	0:02	0:01	15623550834	12816404536	35168257631221 APPLE IPHONE15	310280113409542	MT	[NIOP]
49	12/12/24	19:29:58	0:01	0:03	12816404536	15623550834	35168257631221 APPLE IPHONE15	310280113409542	MO	[ ]
50	12/12/24	19:30:20	0:14	6:31	12816404536	15623550834	35168257631221 APPLE IPHONE15	310280113409542	MO	[ ]
51	01/09/25	19:44:37	0:04	9:35	15623550834	12816404536	35168257631221 APPLE IPHONE15	310280113409542	MT	[NIOP]
52	01/14/25	16:12:35	0:03	0:04	15623550834	12816404536	35168257631221 APPLE IPHONE15	310280113409542	MT	[NIOP]
53	01/14/25	16:12:42	0:01	0:03	15623550834	12816404536	35168257631221 APPLE IPHONE15	310280113409542	MT	[NIOP]
54	01/14/25	16:13:06	0:05	3:06	12816404536	15623550834	35168257631221 APPLE IPHONE15	310280113409542	MO	[ ]
55	01/31/25	20:13:09	0:01	0:02	15623550834	12816404536	35168257631221 APPLE IPHONE15	310280113409542	MT	[NIOP]
56	01/31/25	20:13:14	0:01	0:02	15623550834	12816404536	35168257631221 APPLE IPHONE15	310280113409542	MT	[NIOP]
57	01/31/25	20:25:58	0:07	0:02	12816404536	15623550834	35168257631221 APPLE IPHONE15	310280113409542	MO	[ ]
58	01/31/25	20:26:23	0:21	0:00	12816404536	15623550834	35168257631221 APPLE IPHONE15	310280113409542	MO	[ ]
59	01/31/25	20:26:33	0:08	0:02	12816404536	15623550834	35168257631221 APPLE IPHONE15	310280113409542	MO	[ ]

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4205016.001  
03/23/2025

AT&T has queried for records from 10/08/2020 12:00:00am to 03/17/2025 11:59:59pm  
AT&T has queried for records using Eastern Time Zone. AT&T's records are stored and provided in UTC.

Run Date: 03/23/2025  
Run Time: 09:17:33  
Voice Usage For: (281)640-4536, (562)355-0834

Item	Conn. Date	Conn. Time (UTC)	Seizure Time	ET	Originating Number	Terminating Number	IMEI	IMSI	CT	Feature
60	01/31/25	21:20:45	0:01	0:02	15623550834	12816404536	35168257631221 APPLE IPHONE15	310280113409542	MT	[NIOP]
61	01/31/25	21:20:54	0:01	0:02	15623550834	12816404536	35168257631221 APPLE IPHONE15	310280113409542	MT	[NIOP]
62	01/31/25	21:21:38	0:02	0:02	15623550834	12816404536	35168257631221 APPLE IPHONE15	310280113409542	MT	[NIOP]
63	01/31/25	21:24:00	0:05	4:24	12816404536	15623550834	35168257631221 APPLE IPHONE15	310280113409542	MO	[ ]
64	02/12/25	03:07:14	0:01	0:00	15623550834	12816404536		310280113409542	MT	[NIOP]
65	02/12/25	03:07:17	0:04	0:01	15623550834 18324949000(F)	12816404536		310280113409542	MT	[NIOP:CFNR:VM]
66	02/12/25	04:38:32	0:11	0:00	12816404536	15623550834	35168257631221 APPLE IPHONE15	310280113409542	MO	[ ]
67	02/12/25	04:40:14	0:32	0:02	12816404536	15623550834	35168257631221 APPLE IPHONE15	310280113409542	MO	[Wi-Fi]
68	02/12/25	18:05:11	0:35	0:02	12816404536	15623550834	35168257631221 APPLE IPHONE15	310280113409542	MO	[ ]
69	02/12/25	19:35:03	0:03	18:02	15623550834	12816404536	35168257631221 APPLE IPHONE15	310280113409542	MT	[Wi-Fi:NIOP]
70	02/13/25	01:35:02	0:08	0:25	15623550834	12816404536	35168257631221 APPLE IPHONE15	310280113409542	MT	[NIOP]
71	02/25/25	02:54:21	0:02	0:04	15623550834	12816404536	35168257631221 APPLE IPHONE15	310280113409542	MT	[Wi-Fi:NIOP]
72	02/25/25	02:54:28	0:01	0:02	15623550834	12816404536	35168257631221 APPLE IPHONE15	310280113409542	MT	[Wi-Fi:NIOP]
73	03/11/25	21:26:40	0:18	0:18	12816404536	15623550834	35046582459919 APPLE IPHONE16	310280165961834	MO	[ ]

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AT&T has queried for records using Eastern Time Zone. AT&T's records are stored and provided in UTC.

Run Date: 03/23/2025  
Run Time: 09:17:33  
SMS Usage For: (281)640-4536, (562)355-0834

Item	Conn. Date	Conn. Time (UTC)	Originating Number	Terminating Number	IMEI	IMSI	Desc	MMS Type	Feature
1	10/31/24	21:56:01	12816404536	15623550834		310280113409542	SMSO	Text	
2	10/31/24	21:56:01	12816404536	15623550834			SMST	Text	
3	11/01/24	03:56:51	15623550834	12816404536		310280113409542	SMST	Text	
4	11/01/24	03:57:11	15623550834	12816404536		310280113409542	SMST	Text	
5	11/01/24	03:57:16	15623550834	12816404536		310280113409542	SMST	Text	
6	11/01/24	20:51:17	15623550834	12816404536		310280113409542	SMST	Text	
7	11/07/24	19:31:08	15623550834	12816404536		310280113409542	SMST		
8	11/07/24	19:31:08	15623550834	12816404536		310280113409542	SMST		
9	11/07/24	19:31:16	15623550834	12816404536		310280113409542	SMST		
10	11/07/24	19:31:16	15623550834	12816404536		310280113409542	SMST		
11	01/31/25	20:25:59	15623550834	12816404536		310280113409542	SMST		
12	01/31/25	20:26:24	15623550834	12816404536		310280113409542	SMST		
13	01/31/25	20:26:35	15623550834	12816404536		310280113409542	SMST		

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# **EXHIBIT 88-B**

**Transcription - 429378-437971921-11152023-112541-  
DCP\_009-051-5623550834-2003 (Excerpt)**

Tory Lanez: You've got the Megan bitch trying to make it seem like, or the Meghann Cuniff lady trying to make it seem like we don't know what we're doing, which is fine. Because I love being the underdogs. But I love being the underdog who wins the race. And my thing is just like, if we can, if this can help us win the race, then let's use everything that we can use to win the race.

# **EXHIBIT 89-B**



**Transcription - 429378-448169631-12172023-084104-  
DCP\_007-311-5623550834-2003 (Excerpt)**

Tory Lanez: The only name she was just a fucking, just a fucking, was just a girl coming on Instagram Live.

Ceasar McDowell Oh, with, I forgot that girl's name, the, the it was the Milagro one. You talking about that one?

Tory Lanez: No, I'm talking about the girl, the girl from the whole case. Like, Megan, I'm talking about her.

Ceasar McDowell: Oh, oh, oh.

# **EXHIBIT 90-B**

**Transcription - 2024.11.14 - 429378-550656891-11152024-191131-DCP\_007-225-5623550834-2003 (Excerpt)**

Ceasar McDowell: Did you hear about that new case we got with Milagro, and that the lawyers from Roc Nation, or something like that?

Tory Lanez: Oh, yeah, I don't know anything about it.

Ceasar McDowell: Yeah, yeah, yeah, yeah, I forgot, I didn't even remember if I told you we got that case, but, yeah, that one's crazy. This, that case, they're talking about...

Tory Lanez: Oh, I know what you're talking about.

Ceasar McDowell: They're suing, they're suing, yeah, they're suing the girl, Milagro, and saying, whoop dee whop. So, yeah, I didn't even tell you about that case yet, but, yeah, we got that case with us.

Automated Voice: *This call and your telephone number will be monitored and recorded.*

Ceasar McDowell: Saying that she was slandering

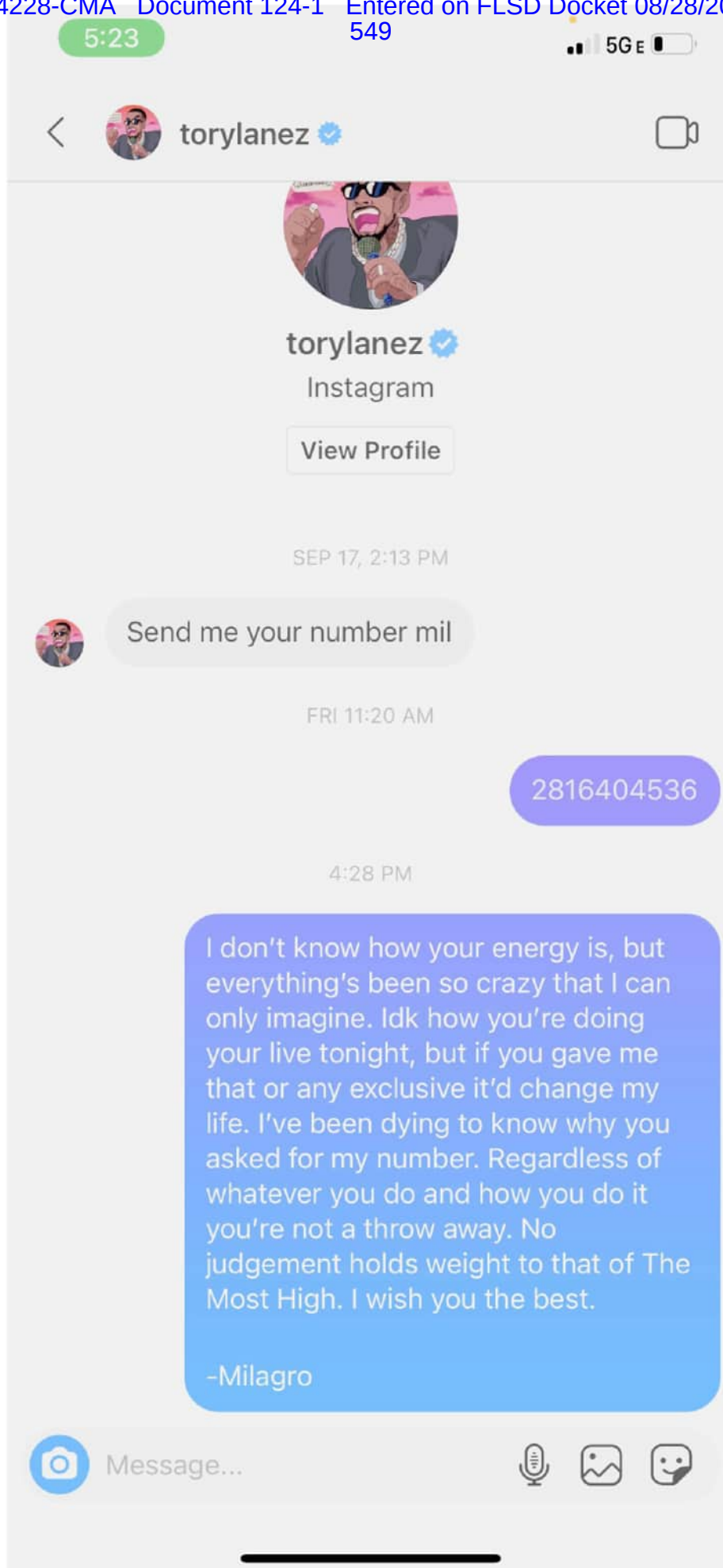
Tory Lanez: I saw that shit online. Aren't they like saying some weird shit about me too? Like saying, oh, relinquish all your communication and all kinds of shit.

Ceasar McDowell: Oh yeah, yeah, matter of fact . Yeah, they was even saying some shit like, hey, you're right. Yeah, they were saying some shit about that case about you to something about, oh, she was communicating with you or some bullshit. I don't know about that case. I mean, I don't know.

Tory Lanez: Like yeah, the funniest thing about this whole thing is like when they go looking and they find nothing, they're going to be like, what?

# EXHIBIT 91





# **EXHIBIT 93**

Messages - Daystar Peterson

iMessage  
12/21/2022 11:33:20 PM

Yoooooow

It's Tory

Hit me

# **EXHIBIT 94-B**

**Transcription - 429378-551965905-11192024-211622-  
DCP\_009-238-5623550834-2003 (Excerpt)**

Ceasar McDowell: I had to pay \$5,000 today to retain that firm in Florida just so that we can use have their, their shit just like the pro-hac.



# **EXHIBIT 95-B**

File: 2024.12.04 - 429378-556519759 (Excerpt).m4a

Speaker	Conversation
Cesar McDowell:	Yeah. I can't tell you because Mitch told me not to because you're our client.
Tory Lanez:	Your fool was in a porno! Ha ha ha ha ha ha ha ha ha ha ha. [indiscernable].COM. Some niggerish shit too.
Cesar McDowell:	[overtalking] Hold on a minute. Hold on one second. Listen. [laughing] I'm gonna tell you some shit.
Tory Lanez:	Long ding dong. [overtalking]
Cesar McDowell:	Huh? Thank you thank you, bro.
Tory Lanez:	Long ding dong.com. I'm a black. I'm a--
Cesar McDowell:	Geez, I'm a gonna tell you some shit. But you got to swear to God that you can't even tell Reyna. Uh, you can't tell no, you can't tell Ray, you can't tell no—
Tory Lanez:	I'm not going to tell nobody bro, but I know that this is not even going to be as serious as you niggas is making it, bro.
Cesar McDowell:	When you see what I'm saying, you're going to go, you know, like nigga. Somebody informed us-- and she doesn't know that we all know-- the whole entire staff knows, everybody has seen everything everybody knows. She don't know that we know. So somebody hit us. She knows that I know-- she don't even think I'm smart enough to know. Somebody hit us from a whole 'nother state, it was like "Yo! So-and-so I recognize that so-and-so." I'm like, "What? Like, man, you don't recognize her. Bullshit." Woop-dee-woop-dee-woop. So I check into it. [overtalking/laughter] So I checked into it and I fell to my knees. Oh, not she. Right? Right?
Tory Lanez:	That is funny.
Cesar McDowell:	Nigga.
Tory Lanez:	Well, you know, [overtalking] you know, she always says, bro, there was one point in her life when she was a model because nobody knows what she was talking about. Y'know what I'm sayin'? Serious, nobody knows what she was talking about.







Cesar McDowell:	Hey, listen. Crystal was a full on porno star. Crystal has—
Tory Lanez:	That's what I'm sayin'. I can see that a hundred percent, bro. [laughing]
Cesar McDowell:	Crystal has - the name is Vivian West, right?
Tory Lanez:	[laughter] Vivian West! What an 80s name.
Cesar McDowell:	Hey, Listen. We always—She always tells us, that “Yes, I was a dancer. I did that scene?” and” da-da-da-da-da—Though somebody hear ‘dis— Somebody hits us--
Tory Lanez:	Nah, you gonna full-blow that, nigga. [laughing]
Cesar McDowell:	Some lady hit us online and was like, “If you tell anybody, if this gets back to her, she can actually go sue me and try to shut me down because I'm telling a client some information like this,” and you [overtalking] are her now. I mean you are callin' this-- But listen though. And then you lose all respect for her. Once you go see it, I lost all respect. [laughing]
Tory Lanez:	Did you just suck at that, [bitch?]
Cesar McDowell:	Come on, nigga. She's getting—she's in the movies—hey. She's in the video and she's like, “Hi, yes, my name is Vivian,” and they're like, “Yes, so where are you from?” “I'm from Colorado,” and he was like, well--you know, she always complains about her husband, right? Her husband don't fuck her, he ain't fucked her in years, right? They don't even live together, right? [Laughter] But he got a business. But she always be like—“Yeah, she's dating other people... and [unintelligible] And then she came out here, and she liked one of my homies, a little light-skinned black nigga. And she like, she says “I want to marry him-- I want to go take him home,” right? Da-da-da-da-dah, and we all laugh. And I'm like, you don't [appreciate?--] You don't know how to take nobody home. Nigga. Look I-- There is videos with this bitch, 10 niggas fucking her, the biggest sister [laughter/overtalking] in there, [caught in?] there—I mean--
Tory Lanez:	That's what I would tell' you! I just already—Bro. Before you even said it, I was just like, Bro. this is always-- I thought of every possible option. And I was like, “Okay, either she's fucking some nigga that we all know, and then he has the sex tape,” or da da da da. And I thought about it, and I'm like, Bro, it can't be anything else but-- She has to have been a porn star before this. Like, that's just the only thing it could have been. But you know what? Hey, I'm don't give a fuck how many dicks she takes. ‘long as she gets me out'ta jail, [laughing.]
Cesar McDowell:	Hey, nigga, she got transvestites gang-banging her.





# **EXHIBIT 96**

Chat Filters		<input checked="" type="checkbox"/> Events	<input checked="" type="checkbox"/> History	<input checked="" type="checkbox"/> Disclaimers		
<input checked="" type="checkbox"/>	Participant	Entity	Login	Email		
<input checked="" type="checkbox"/>	 +12816404536		+12816404536		0	0
<input checked="" type="checkbox"/>	 +14246031511 Jazmyne		+14246031511		0	0

+15623550834 Ceasar McDowell

09E56144-394B-48AE-8106-D22EA1673ED0.pluginPayloadAttachment  
5E6743C3-4EDE-4B6D-8DB0-3B467DB7D076.pluginPayloadAttachment

+15623550834 Ceasar McDowell

+15623550834 Ceasar McDowell

2024-11-01 03:57:16.000 AM

+15623550834 Ceasar McDowell

2024-11-01 08:51:18.000 PM

Milagro calling you in 5 min with the lawyers

# EXHIBIT 97

14538bdc-b9db-4c67-a2e5-9aec8411b6ca - +15623550834

EXHIBIT

RONNY ZAVOS

Chat Filters							<input checked="" type="checkbox"/> Events	<input checked="" type="checkbox"/> History	<input checked="" type="checkbox"/> Disclaimers
<input checked="" type="checkbox"/>	Participant	Entity	Login	Email					
<input checked="" type="checkbox"/>	+12816404536		+12816404536		0	0			
<input checked="" type="checkbox"/>	+15623550834 Ceasar McDowell		+15623550834		3	0			
	+15623550834 Ceasar McDowell				2024-11-07 07:21:21.000 PM				
	Can you call me it's important thank you								
	+15623550834 Ceasar McDowell				2024-11-07 07:31:09.000 PM				
	I'll call you back.								
	+15623550834 Ceasar McDowell				2024-11-07 07:31:17.000 PM				
	I'll call you back.								
	12816404536 Milagro				2024-11-07 07:31:19.000 PM				
	Ok								
	12816404536 Milagro				2024-11-07 07:31:24.000 PM				
	Was on air								

# **EXHIBIT 98**

14538bdc-b9db-4c67-a2e5-9aec8411b6ca - +15623550834

Chat Filters

☒ Events

☒ History

☒ Disclaimers

<input checked="" type="checkbox"/>	Participant	Entity	Login	Email		
<input checked="" type="checkbox"/>	+12816404536		+12816404536		0	0
<input checked="" type="checkbox"/>	+15623550834 Ceasar Mc Dowell		+15623550834		1	0

+15623550834 Ceasar McDowell

2024-12-12 07:29:22.000 PM

Hey when you get a chance if you could give me a call that would be great as soon as possible

# **EXHIBIT 99**



Document title: (1) Milagro on X: "Tory Lanez, his father Sonstar Peterson, and blogger Milagro Gramz are firing back at claims from Megan Thee Stallion's lawyers that they're conspiring to spread misinformation and harass the Roc Nation rapper in a complaint filed this week. The allegations largely stem from <https://t.co/pmffNvIMM9>" / X

Capture URL: <https://x.com/MobzWorld/status/1867646509606477983>

Page loaded at (UTC): Sun, 23 Feb 2025 02:35:01 GMT

Capture timestamp (UTC): Sun, 23 Feb 2025 02:35:59 GMT

Capture tool: 10.55.0

Collection server IP: 54.145.42.72

Browser engine: Mozilla/5.0 (X11; Linux x86\_64) AppleWebKit/537.36 (KHTML, like Gecko) Chrome/126.0.6478.234 Safari/537.36

Operating system: Linux (Node 20.17.0)

Capture ID: 8DPKak6EMTJFY8bce43FAw

C. MCDOWELL  
07.25.25

**Exhibit 99**

RONNY ZAVOSKY

X

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Tory Lanez, his father Sonstar Peterson, and blogger Milagro Gramz are firing back at claims from Megan Thee Stallion's lawyers that they're conspiring to spread misinformation and harass the Roc Nation rapper in a complaint filed this week.

The allegations largely stem from jailhouse phone calls between Tory, Sonstar and Milagro (real name Milagro Cooper) ... but Caesar McDowell, CEO of Unite the People, says his client is a victim of a calculated legal takedown.

Cesar tells TMZ Hip Hop, "We are deeply concerned by the continued efforts to spin partial stories in an attempt to distort the truth and mislead the public."



Tory Lanez Denies Megan Thee Stallion Smear Campaign, Says Her Lawyers Omitted Facts

EXCLUSIVE

TORY LANEZ & MILAGRO GRAMZ Megan Harassment Campaign Is Complete Lies ... LIKE EDITING HIS DAD'S PHONE CALL

Tory Lanez, his father Sonstar Peterson, and blogger Milagro Gramz are firing back at claims from Megan Thee Stallion's lawyers that they're conspiring to spread misinformation and harass the Roc Nation rapper in a complaint filed this week.

The allegations largely stem from jailhouse phone calls between Tory, Sonstar and Milagro (real name Milagro Cooper) ... but Caesar McDowell, CEO of Unite the People, says his client is a victim of a calculated legal takedown.

Cesar tells TMZ Hip Hop, "We are deeply concerned by the continued efforts to spin partial stories in an attempt to distort the truth and mislead the public."

7:03 PM · Dec 13, 2024 · 58.1K Views

42

166

768

68

Post your reply

Reply

Milagro

@MobzWorld

· Dec 13, 2024

It's noted the jailhouse phone calls aren't quoted too much in the complaint and Caesar says it's because there's clear evidence there's no harassment taking place!!!

Cesar says ... "The most recent wave of accusations involves claims that during a phone call, Mr. Peterson's father allegedly stated, 'Ms. Pete would be unable to prove that Mr. Peterson paid Ms. Cooper to attack Ms. Pete.' However, they conveniently omitted a crucial part of the conversation where Mr. Peterson's father added, 'because you didn't.'"

"Personally, I believe that the opposing party knows 100% without a reasonable doubt that they are going to lose this lawsuit. That's why

Relevant people

Milagro

@MobzWorld

"I'm just gone make another one."


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...

Document title: (1) Milagro on X: "Tory Lanez, his father Sonstar Peterson, and blogger Milagro Gramz are firing back at claims from Megan Thee Stallion's...  
Capture URL: https://x.com/MobzWorld/status/1867646509606477983  
Capture timestamp (UTC): Sun, 23 Feb 2025 02:35:59 GMT  
Page 1 of 8  
Pete\_0000005

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"because you didn't."

"Personally, I believe that the opposing party knows 100% without a reasonable doubt that they are going to lose this lawsuit. That's why they amended their original complaint in the first place. ... Whatever the reason, it doesn't matter. This is a 100% losing case, and they're grabbing at straws, hoping something sticks in the media. The judge is going to dismiss the case from this."

- 

y @YAHREE212 · Dec 13, 2024

did desiree stop paying the blogs and that cockeyed cuniff reporter?

1 45 230 10K
- 

Mo @whodafuckismo · Dec 13, 2024

... exactly! They wanted that updated lawsuit to sound sketchy, they purposely drafted it that way! Once again, playing games in the court of law! They definitely omitted facts to fit their narrative.

Pretty hypocritical eh? Won't look good in court for her!

3 42 1.5K
- 

GrandsonX of Bel Air @ivy1grandson · Dec 13, 2024

Are you the same Milagro?


2 3 771
- 

Give Me Rent @thewigcollect0r · Dec 13, 2024

1 371
- 


Eli De La Cruz @de\_lacruz1988 · Dec 13, 2024

Hope you win this Milagro! I love your show you always give such unbiased commentary!

1 5 600
- 

Myfault @Geeshgina · Dec 13, 2024

I was watching Millie when she first started, when she was making reviews about reality shows like love and hip hop, sitting in a chair in her room. She is the one who put me on to Megan the stallion! It's crazy to see all this play out

2 206
- 

Cash Castro @CashCastroTweet · Dec 14, 2024

Sonstar? what type name

72
- 

flexonzonee. @Championog0 · Dec 13, 2024



## Relevant people

Milagro  
@MobzWorld  
"I'm just gone make another one."

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## What's happening



Khloé in Wonder Land  
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@qe\_datacollect







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More

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da scholar


@kevmadde · Jan 4

you are done 🤔

40

1K

8



da scholar


@kevmadde · Jan 4

look at these messy supportive people

40

1K

8



Narcissistic SAVAGE


@Pre\_Tee\_Az\_DevN · Dec 13, 2024

They Doing All This Against YOU & We Still Don't Believe Tory Shot Her 🤔 !! . #FreeToryLanez 🤔

4

40

1K



Veganbae

@VeganBae29 · Dec 13, 2024


They grasping at straws because Megan career on life support.

3

4

63

1.6K



Talk Like This


@VonThisVonThat · Dec 13, 2024

They clearly didn't consider how hard you went for Tory, how hard would you go for yourself

2


62


1.6K



Nobody's Favorite

@CGray31 · Dec 13, 2024





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Document title: (1) Milagro on X: "Tory Lanez, his father Sonstar Peterson, and blogger Milagro Gramz are firing back at claims from Megan Thee Stallion's...  
Capture URL: https://x.com/MobzWorld/status/1867646509606477983  
Capture timestamp (UTC): Sun, 23 Feb 2025 02:35:59 GMT  
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Pete\_0000008













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**datacollection\_...**  
@qe\_datacollect



# EXHIBIT 100

Document title: Instagram

Capture URL: [https://www.instagram.com/p/DGeUsyxSUS\\_/?igsh=NjZiM2M3MzIxNA%3D%3D](https://www.instagram.com/p/DGeUsyxSUS_/?igsh=NjZiM2M3MzIxNA%3D%3D)

Page loaded at (UTC): Mon, 07 Apr 2025 17:58:52 GMT

Capture timestamp (UTC): Mon, 07 Apr 2025 18:00:06 GMT

Capture tool: 10.55.0

Collection server IP: 54.145.42.72

Browser engine: Mozilla/5.0 (X11; Linux x86\_64) AppleWebKit/537.36 (KHTML, like Gecko) Chrome/126.0.6478.234 Safari/537.36

Operating system: Linux (Node 20.17.0)

PDF length: 3

Capture ID: 63VobdnowHx7c8T4dVPJ23

Display Name: brandondietzman

C. MCDOWELL  
07.25.25

**Exhibit 100**

RONNY ZAVOSKY

PDF REFERENCE #: 5YLuErwmTtDatPbxfiYViJ

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### UNITE THE PEOPLE inc. CEO CEASAR McDOWELL SETS THE RECORD STRAIGHT ON DEPOSITION. (IN RE TORY LANEZ)

Lately I haven't been responding to all the rhetoric in the media... but after reading the misinformation attempted to be spread by the media "puppet or puppets" I can no longer bite my tongue.

Megan The Stallion's lawyers continue to try and give the appearance their case against Milagro Cooper is successfully progressing by giving their "supposed mouthpiece", Meghan Cuniff and all other persons, media or non media, wrong information. Perhaps Meghan Cuniff really does not know what she is talking about. Just as she misunderstood, perhaps intentionally, or tried to spin the fact UTP forced Megan's lawyers to change their allegations against Ms. Cooper twice, resulting in them amending their complaint "MULTIPLE TIMES"... she now misunderstands, again perhaps intentionally, the meaning of a potential deposition of Tory Lanez. She continues to speak and removes all doubt SHE IS IGNORANT!

Tory Lanez is not a party to Megan The Stallion's lawsuit against UTP client Milagro Cooper and therefore UTP is not obligated to produce Tory Lanez for a deposition. Nor did UTP agree or disagree to a deposition of Mr. Lanez or any other potential witness. By law Megan's lawyers can depose any person they believe possesses useful information to their case. To imply UTP is going along with Megan's wishes, or somehow is being manipulated into going along, is simply wrong, as everything else Ms. Cuniff and others have said. Despite her efforts to show she is the most useful of "ignorant tools" to Megan's counsel, she is repeatedly wrong about what is really happening in this case.

Lastly, if you know Tory Lanez how I do, good luck trying to get him to "testify" to anything, it's just not what he does... and he definitely did not "agree" to testify now.

CEASAR McDOWELL

CEO UNITE THE PEOPLE inc.



unitethepeopleusa and ceasar\_mcdowell

...



unitethepeopleusa 5w

From @ceasar\_mcdowell regarding #ToryLanez deposition rumors.



ceasar\_mcdowell 5w

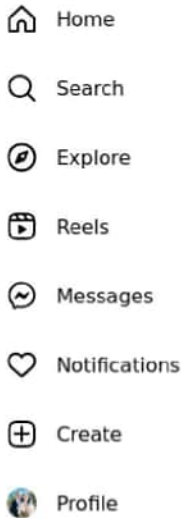
@MeghannCuniff I'm gonna say it to you so you can't ever say no one made you aware ... you are being a culture vulture. You are trying to gain relevancy in a business that you are not relevant in . The only people who know you are these people who are involved in this case, friends, families, , but you are playing with these young black people's lives, and there's nothing cool about that. You have clearly taken sides and probably more, but we'll leave that between you and I. For now, You know what I'm talking about? But the way you are playing with these young black people's lives isn't funny to me. Everything you're trying to do you think is cute. But this is a young black man, 2 young black women. These are black children, black families, black Mother's, black fathers, black brothers and you're playing with their lives just so you can get some likes?!! so you can get some views?!! so you can try to be relevant?!! That is the definition of culture vulture. If not "slave master" you are trying to get rich by defaming and degrading these black people, and it's time someone told you, you are out of line!! Don't nobody give a d\*\*\* about your opinions. Don't nobody give a d\*\*\* about how you feel. You're supposed to be a reporter. If you're a reporter, then report on the facts, you do that won't nobody have a problem with it. The problem is, you think this is a game and there's a lot of people involved, and there's a lot of black families who are affected by this a lot of people in pain . Friends,

♡

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Lastly, if you know Tory Lanez how i do, good luck trying to get him to "testify" to anything, it's just not what he does... and he definitely did not "agree" to testify now.

CEASAR MCDOWELL  
CEO UNITE THE PEOPLE Inc.



unitethepeopleusa and ceasar\_mcdowell



**unitethepeopleusa** 5w  
From @ceasar\_mcdowell regarding #ToryLanez deposition rumors.



ceasar\_mcdowell • 5w

@Meghanncuniff I'm gonna say it to you so you can't ever say no one made you aware ... you are being a culture vulture. You are trying to gain relevancy in a business that you are not relevant in . The only people who know you are these people who are involved in this case, friends, families, , but you are playing with these young black people's lives, and there's nothing cool about that. You have clearly taken sides and probably more, but we'll leave that between you and I. For now, You know what I'm talking about? But the way you are playing with these young black people's lives isn't funny to me.

Everything you're trying to do you think is cute. But this is a young black man, 2 young black women. These are black children, black families, black Mother's, black fathers, black brothers and you're playing with their lives just so you can get some likes???? so you can get some views???? so you can try to be relevant???? That is the definition of culture vulture. If not "slave master" you are trying to get rich by defaming and degrading these black people, and it's time someone told you, you are out of line!! . Don't nobody give a d\*\*\* about your opinions. Don't nobody give a d\*\*\* about how you feel. You're supposed to be a reporter. If you're a reporter, then report on the facts, you do that won't nobody have a problem with it. The problem is, you think this is a game and there's a lot of people involved, and there's a lot of black families who are affected by this a lot of people in pain . Friends, families, fans alike. And that's on all sides, I'm not just speaking for one side, I'm speaking for all sides. You are out of line! Stop Trying to gain fame off the sweat of these black people, off the pain of these black people, off the misfortune of these black people, it's starting to remind us of "SLAVERY", we're starting to feel like you really think you you are untouchable in this and you can just play with these black people and it's all cool, so you can get some likes or get some views. We're not gonna keep standing for that. You need to stay in your lane. Stay in your place, be a reporter report. That's great. Stop acting like the slave master!

54 likes   Reply

[View all 3 replies](#)



**meghanncuniff** 5w  
Two Ns in Meghann, please!

6 likes Reply

[View all 47 replies](#)



**sophiajazz\_** 5w  
Megan cuniff got called out during the ASAP rocky trial for being biased but when Tory did it was a problem

# **EXHIBIT 100-B**

**Transcription: 429378-546481079-11012024-231138-DCP\_018-057-5623550834-2003 –  
Excerpt #2**

Tory Lanez: Hey, let me ask you something, bro. You don't think we should uh uh uh ..  
You don't think we should do another another bailout? Like...

Ceasar McDowell: You know, that would be kind of fire.

Tory Lanez: Get some get some cheaper bails. Like niggas who have like small bills,  
but they really just can't afford it. Like, get some cheap ones and that way  
you can still give some money to the firm? I'm saying like we get some  
cheap bails like - but just get as many you know what I mean?

Ceasar McDowell: Yeah, I hear you. I - we could uh you know that might be another good  
look - but I really want you to sit on your money for you know what I  
mean? I mean we we can.

Tory Lanez: I'm saying - I'm saying instead of doing like instead of doing um the  
Hands of God for prisoners one month, maybe we just do the niggers in  
time in jail. You know what I'm saying?

Ceasar McDowell: Yeah, we could do that. But I tell you what we do. We make it bigger this  
time. Tory Lanez donated \$100,000 and he still be 30. You know what I  
mean? And just be like, man, you know, and whoo whoo whoo wap just  
make it bigger.

Automated: You have 60 seconds remaining.

Ceasar McDowell: Oh, damn it. But uh yeah, we we could do some shit. Like I really want to  
holla atchu about this Milagro shit and my ideas and see what you think -  
cuz I got to get to on to the [indiscernible]

Tory Lanez: We'll talk tomorrow in the morning about it.

Ceasar McDowell: Yeah, cuz I I got to get at the people, man. So, hit me up when you get  
some time, bro.

Tory Lanez: I'll hit you in the morning when I get up.

# **EXHIBIT 102-B**



**Transcription**

**2025.04.15 – Tory Lanez Court Nightmare – Excerpt #2**

**Milagro Elizabeth Cooper:**

Then they said Mr. Peterson denied knowing if he discussed or approved or authorized the statement made by Unite the People in which Mr. McDowell stated that Mr. Peterson would not testify because Mr. Peterson claimed to not understand the definition of 'discuss' or 'approve'.

Ms. Henderson said "Did you discuss approve or authorize any statement made by Unite the People regarding your deposition today?"

Mr. Peterson said "I would like the definitions of discuss approve and whatever you said - Can you give me those please?"

Ms. Henderson said "Okay so my you don't understand the word discuss."

Mr. Peterson said "No but I would like the definitions." I want your definition because you're asking me the questions so I would like your definitions Ms. Henderson thank you.

Ms. Henderson said "Okay." So did you speak with or talk to anyone at Unite the People about your deposition.

No I'm asking you for the definition of discuss can you give me that please from Webster?

And I'm going to read it just as a conversation at this point and look at the screen to keep track.

Mr. Peterson did you talk to anyone at Unite the People about a statement regarding your deposition.

You still haven't given me the definition of the words that you first asked and I'm asking you for those so I can give you a clear and understandable answer.

# **EXHIBIT 103-B**

**Transcription**

**2025.04.15 – Tory Lanez Court Nightmare – Excerpt #1**

**Milagro Elizabeth Cooper:** and I also firmly believe that there are some people who have some feelings about my proximity to Daystar . I..I do think that there are people jealous about my relationship of sorts. What, However you want to name. A relationship can be a friendship, a business relationship ,whatever - Don't make it romantic.

I think that there are a lot of people who are uh very - they they feel a way about the fact - I think people feel away about the fact that that Tory daddy loves me. I think people feel a way about the fact that you know other people care for me. I, I do. Yeah I do - but we will digress at this time now.

# **EXHIBIT 104-B**

**Transcription**

**2025.05.14 – Press Conference – Excerpt #1**

**Walter Roberts:**

The only party that responded was last week was Megan Pete's representatives with a request for more information. A few days later Mr. Peterson is brutally attacked in a jail cell.

# **EXHIBIT 105-B**

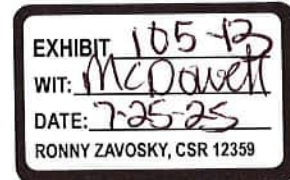
## Transcription

## 2025.05.14 – Press Conference – Excerpt #2

### Gianno Caldwell:

Mr. Peterson was never given a fair trial free from bias, political interference and media driven pressure. He cont - His continued incarceration erodes public trust and diverts focus from the real real work of keeping our community safe.

Further while incarcerated Mr. Peterson was recently stabbed in prison. As many of you know, a tragic incident that underscores the urgency of this situation and the risk to his life while this case remains un-adressed.



# **EXHIBIT 106-B**



**Transcription**

**2025.05.14 – Press Conference – Excerpt #3**

**Diana London:**

After over two years in prison - uh after over two years in prison without incident, Tory was stabbed 14 times. Just days after a major national news outlet reached out to Megan Pete's team, Kelsey Harris and former DA George Gascone about a story on new evidence in this case.

You don't have to believe in conspiracies to see the pattern. When evidence was about to come to light, Tory was nearly killed. So let's stop pretending this is complicated. Let's stop treating this like some cultural war flash point.

# **EXHIBIT 107-B**

**Transcription**

**2025.05.16 - x.com - Milagro is Broke – Excerpt**

**Milagro Elizabeth Cooper:** They absolutely implicated Roc Nation in the attempted murder of Daystar Peterson. on national news. That's what you saw. That is exactly what you saw.

And he also gave a lightly veiled, I wouldn't call it a threat, but a lightly veiled, I don't I don't know what the fuck you want to call it. Hey, I don't know. But I felt like he was touching on Desiree Perez because he says something to the effect of or was questioning why an executive in that position from a record company would be in the room with a victim.

Why was this person in the room with Kelsey Harris? What the fuck is going on?

C. MCDOWELL  
07.25.25

**Exhibit 107-B**

RONNY ZAVOSKY

# **EXHIBIT 108**

14538bdc-b9db-4c67-a2e5-9aec8411b6ca - +15623550834						
Chat Filters <input checked="" type="checkbox"/> Events <input checked="" type="checkbox"/> History <input checked="" type="checkbox"/> Disclaimers						
<input checked="" type="checkbox"/>	Participant	Entity	Login	Email		
<input checked="" type="checkbox"/>	+12816404536		+12816404536		0	0
<input checked="" type="checkbox"/>	+15623550834 Ceasar McDowell		+15623550834		3	0
+15623550834 Ceasar McDowell 2024-11-12 07:20:01.000 PM						
Hey when you get a chance answer your phone Walter is trying to give you a call from my office it'll be at 562 number I just tried to call you twice but it didn't go						
+15623550834 Ceasar McDowell 2024-11-12 07:20:28.000 PM						
Walter should be sending you a text he's on the legal team here						
+15623550834 Ceasar McDowell 2024-11-12 07:20:38.000 PM						
He just wants to update you that there's nothing to worry about I'm sure						

EXHIBIT

108

WIT: McDowell

DATE: 7-25-25

RONNY ZAVOSKY, CSR 12359

# **EXHIBIT 109**

C. MCDOWELL  
07.25.25

**Exhibit 109**

RONNY ZAVOSKY

Document title: Walter James Roberts IV # 225339 - Attorney Licensee Search

Capture URL: <https://apps.calbar.ca.gov/attorney/Licensee/Detail/225339>

Page loaded at (UTC): Wed, 23 Jul 2025 18:40:26 GMT

Capture timestamp (UTC): Wed, 23 Jul 2025 18:41:25 GMT

Capture tool: 10.58.0

Collection server IP: 54.145.42.72

Browser engine: Mozilla/5.0 (X11; Linux x86\_64) AppleWebKit/537.36 (KHTML, like Gecko) Chrome/138.0.7204.97 Safari/537.36

Operating system: Linux (Node 22.17.0)

PDF length: 4

Capture ID: fB9T8GTUZXrDXCrDCesBvm

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## Attorney Profile

### Walter James Roberts IV #225339

License Status: **Disbarred**

This licensee is prohibited from practicing law in California by order of the California Supreme Court.

#### CONSUMER ALERT

This attorney is disbarred from the practice of law. As a result, the attorney is ineligible to practice law in California. The State Bar posts consumer alerts online when attorneys are disbarred. The decision(s) or order(s) are posted on the [State Bar Court Smart Search](#). Anyone who believes they have been the victim of attorney misconduct is urged to file a complaint with the State Bar.

Address: 8726 S. Sepulveda Blvd., A102, Los Angeles, CA 90045

Phone: Not Available | Fax: Not Available

Email: [robertslaw4@aol.com](mailto:robertslaw4@aol.com) | Website: Not Available

[More about This Attorney](#) ▼

### License Status, Disciplinary and Administrative History

The table below shows an attorney's license status changes, disciplinary actions, and administrative actions. Some administrative suspensions are subject to automatic removal from the attorney profile page pursuant to the State Bar's [policy on removal of administrative actions](#). Administrative suspensions are non-disciplinary actions resulting from noncompliance with administrative requirements, such as the requirement to pay licensing fees or comply with Minimum Continuing Legal Education. Administrative suspensions that meet the criteria in the State Bar's policy on removal of administrative actions would not be displayed below.

Date	License Status ⓘ	Discipline ⓘ	Administrative Action ⓘ
Present	<b>Disbarred</b>		
9/14/2011	Disbarred	Disbarment 10-N-06977 ⓘ	
7/1/2011	Not eligible to practice law in CA		Suspended, failed to pay fees
4/23/2011	Not eligible to practice law in CA	Ordered inactive 10-N-06977 ⓘ	
5/2/2010	Not eligible to practice law in CA	Discipline w/actual suspension 08-O-10110 ⓘ	
4/13/2007	Active		
3/16/2007	Not eligible to practice law in	Discipline w/actual suspension 06-O-10128 ⓘ	





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2/20/2007	Not eligible to practice law in CA	Suspended, failed to pass Prof.Resp.Exam 04-O-11044 ⓘ
9/28/2006	Active	
9/18/2006	Not eligible to practice law in CA	Suspended, failed to pay fees
7/31/2005		Discipline, probation; no actual susp. 04-O-11044 ⓘ
10/6/2004		Disciplinary charges filed in State Bar Court 04-O-11044 ⓘ
6/3/2003	Admitted to the State Bar of California	

### State Bar Court Cases

The listing below is partial, as the State Bar Court is transitioning to online dockets. Please refer to the License Status, Disciplinary and Administrative History section above for a record of discipline cases. Case dockets and documents may be available using the State Bar Court Search for a Case feature; see instructions below.

Effective Date ⓘ	Case Number	Description ⓘ
9/14/2011	10-N-06977	Stipulation <a href="#">[PDF]</a> <a href="#">[HTML]</a>
5/2/2010	08-O-10110	Stipulation <a href="#">[PDF]</a> <a href="#">[HTML]</a>
3/16/2007	06-O-10128	Stipulation <a href="#">[PDF]</a> <a href="#">[HTML]</a>
3/16/2007	06-O-10128	Modification Order <a href="#">[PDF]</a>

Here is what you need to know to access discipline documents in public cases:

Documents are added to the State Bar Court's online docket as events occur.

#### Search for a Case

To search for a case, please copy the case number displayed above and click Search for a Case. In the search box, paste the complete case number. If the case number begins with "19" or higher, you must add the prefix SBC to the case number, e.g., SBC [CASE NUMBER]. If a case number begins with 18 or lower, there's no need to add SBC.

Most public case records since 2000 are available through search. Older case records are [available on request](#). The State Bar Court began posting public discipline documents online in 2005.

NOTE: Only [Published Opinions](#) may be cited or relied on as precedent in State Bar Court proceedings.

DISCLAIMER: Any posted Notice of Disciplinary Charges, Conviction Transmittal or other initiating document, contains only allegations of professional misconduct. The licensee is presumed to be innocent of any misconduct until the charges have been proven.



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3/16/2007

06-O-10128

Modification Order [\[PDF\]](#)

Here is what you need to know to access discipline documents in public cases:

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DISCLAIMER: Any posted Notice of Disciplinary Charges, Conviction Transmittal or other initiating document, contains only allegations of professional misconduct. The licensee is presumed to be innocent of any misconduct warranting discipline until the charges have been proven.

**Additional Information:**

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**213-765-1000**



# **EXHIBIT 110**





## Milagro Gramz Official Defense Fund

Goal: USD \$100,000

Campaign created by Milagro Cooper

Campaign funds will be received by Milagro Cooper



## Milagro Gramz Official Defense Fund

My name is Milagro Gramz and I'm being sued by an artist backed by one of the most powerful companies in music. Like many from my generation, I have used the internet to build a community and speak to important issues. In doing so, I defended Tory Lanez against claims that he had committed a heinous crime. This decision has put a target on my back and mounting legal fees could result in a miscarriage of justice. The courts are being

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I Understand

Milagro, today, but with the precedent this would set it could be you tomorrow. Every

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### DaMarcusMom

2 days ago

🙏 Father, send Your angelic hosts to surround the courtroom and ensure righteous judgment in Milagro's favor. Break the power of every word curse spoken against her legal victory, in the name of Jesus. We declare that no lawyer, judge, or official will be able to withstand the wisdom and power of God on my behalf (Luke 21:15).

❤️ 1

### SpiceTheGod

2 days ago

We argue like family & we love you like family Mila . The mob got you ☐

❤️ 2

### Anonymous Giver

2 days ago

❤️ 2

### Anonymous Giver

2 days ago

❤️ 1

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## Updates

### Update #1

February 28th, 2025

It has been less than three days and we have already raised \$10K!

Someone recently told me they felt like they were a part of something that mattered, and I said, "You are." This lawsuit stems from one of the biggest cases in

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## Prayer Requests

Click the Pray button to let the campaign owner know you are praying for them.

Pray

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# **EXHIBIT 111**



7/24/25, 9:54 AM

(5) OPINIONATED\_TRUTHS\_PODCAST on X: #MilagroGramz Crowdfunding Campaign she made due to being "INDIGEN...



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#MilagroGramz Crowdfunding Campaign she made due to being "INDIGENT" to retain a lawyer for defamation civil suit shes in as the Defendant with Megan Thee Stallion has been in question to spectators .

Milagro put the amount raised in private from her donors .. She claimed the United States The People lawyer needed 100k to even do her case she told her followers she sent allegedly 15k and additional 25k (allegedly)

Some spectators noticed she was out spending money for Lulumelon A lot of DoorDash orders of Hibachi 🤔 taking trips to Huntsville to purchase laptops for her granny that she claims has mild dementia 🤔 allegedly . They notice a lot of purchase since the campaign

Well I received a dm from someone that allegedly messaged Unite The People on things she said about them negatively and how much money sges sent them allegedly

According the messages Unite The People responded :

We Please Share Like Comment

#opinionatedtruthspodcast  
#allallegedly

@quinnemanuel @realJNolan @TheMrChadTurner @MalibuDollFace

Via: Anonymous Source

(I cannot verify if this is real )

Please Share

9:07 PM

I can't believe that that is true because she did not give us the full \$18, she sent us a portion of it and that entire portion went to that attorney and of course I have all the receipts of any transfers but besides that what she paid I have personally paid \$50 \$60,000 to that attorney so I would really hope that she wouldn't be bashing us but sure you could send the audio if that is true I would definitely want to hear it I haven't had time to stop and assess the situation but sure

attorneys for free for pro bono for her I personally picked up like I said at least 50 \$60,000 of my own organizations money was paid to that other Florida lawyer plus she sent us a portion of 18 we sent the entire portion to the Florida lawyer and she sent him directly the other portion so we went above and beyond to help Millie and I know they said there was some things going on with him getting off the case myself and my legal team we're just going through ways to find to hire her another lawyer in Florida and we were going to pay for it so if what you're saying is true that would be really sad so yes if there's some audio of that please send that to me but I have to say I doubt that that's true just because after all the personal trouble I went

Last edited 4:34 PM · May 18, 2025 · 4,142 Views



2



24



67



16



Reply



Ms. Bree @RapGirlsWorld · May 19

Parody account



Considering the lack of punctuation and grammatical errors I would say it's

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Starts in

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Business and finance ·

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Trending in United States

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7/24/25, 9:54 AM

(5) OPINIONATED\_TRUTHS\_PODCAST on X: [@OT\\_MilagroGramz](#) Crowdfunding Campaign she made due to being "INDIGEN...  
take out i also oon t expect much from UIC.



77



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And I would really hope she wouldn't be bashing us because we have not only assigned our attorneys for free for pro bono for her I personally picked up like I said at least 50 \$60,000 of my own organizations money was paid to that other Florida lawyer plus she sent us a portion of 18 we sent the entire portion to the Florida lawyer and she sent him directly the other portion so we went above and beyond to help Millie and I know they said there was some things going on with him getting off the case myself and my legal team we're just going through ways to find to hire her another lawyer in Florida and we were going to pay for it so if what you're saying is true that would be really sad so yes if there's some audio of that please send that to me but I have to say I doubt that that's true just because after all the personal struggle I went through to make sure this guy in Florida was getting paid I'm the only one that paid personal money to help her she raised money on a platform I paid



9:07 PM

I can't believe that that is true because she did not give us the full \$18, she sent us a portion of it and that entire portion went to that attorney and of course I have all the receipts of any transfers but besides that what she paid I have personally paid \$50 \$60,000 to that attorney so I would really hope that she wouldn't be bashing us but sure you could send the audio if that is true I would definitely want to hear it I haven't had time to stop and assess the situation but sure



# **EXHIBIT 112**

Document title: (1) Milagro on X: "Also, unfortunately Unite The People, who publicly asserted that they would take on my case of no cost to me, doesn't have the resources to challenge the machine. They withdrew, as the Florida lawyer did for this same reason. Anything else is defamation and the shit is just" / X

Capture URL: <https://x.com/NewMediaaaa/status/1926618838482776312>

Page loaded at (UTC): Sun, 25 May 2025 19:45:50 GMT

Capture timestamp (UTC): Sun, 25 May 2025 19:46:27 GMT

Capture tool: 10.55.0

Collection server IP: 54.145.42.72

Browser engine: Mozilla/5.0 (X11; Linux x86\_64) AppleWebKit/537.36 (KHTML, like Gecko) Chrome/126.0.6478.234 Safari/537.36

Operating system: Linux (Node 20.17.0)

Capture ID: mMXsmWCntJ6RperKXZX7XZ

C. MCDOWELL  
07.25.25

**Exhibit 112**

RONNY ZAVOSKY



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**Milagro** @NewMediaaaa

Also, unfortunately Unite The People, who publicly asserted that they would take on my case of no cost to me, doesn't have the resources to challenge the machine.

They withdrew, as the Florida lawyer did for this same reason.

Anything else is defamation and the shit is just piling up. Y'all keep going.



**ChelseaaaaTn** @ChelseaaaaTn · 16h  
Replying to @Chatnigga101

He ain't told no lie. Milagro is a fkn dummy. She should've been realized Tory was distancin himself frm her & now she's in her feelings bc she's on a sinking ship. Her lawyers quit & UTP quit on her too bc shes problematic, doesn't listen & dnt know how to STFU!

12:38 PM · May 25, 2025 · 12.6K Views



Post your reply

Reply



**Relly Rell** @sherrelli · 1h

UTP have the resources to challenge the machine on Tory Lanez case.



142



**TyNika** @YaGurlWoo · 6h  
Parody account

They just believe anything that comes out of Megan's mouth



32

818



**ajay** @a\_jei20 · 1h

This is really sad and crazy at the same time.



117



**Brina Me@8** @BrinaMe81 · 6h

Oh, ok. I was thinking that since they were representing Tory Lanze that it wouldn't be good since Megan made these frivolous claims against you. Thank you for the clarification 🙏



7

725



**Big Marz** @Planetmarz444 · 3h

Bookmarking this so we can laugh at them later with the "what was said?"



4

253



**LoveyouLondyn** @Shallowmade · 4h

It's crazy so many of yall waiting for the down fall of Milagro when she's not the first or last person that spoke on this case in favor of Tory based off evidence itself ! What does it gain you bitter h\*oes? Yall mad cause yall can't humble her !



2

26

493



**ghost** @panashe263 · 1h

Chat niggas got you 🤔



85

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**Milagro** @NewMediaaaa  
BLACK Culture:  
Entertainment/Music News,  
Updates, Rumors & Opinions.

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**ChelseaaaaTn** @ChelseaaaaTn

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**ghost** @panashe263 · 1h

Chat niggas got you 🤔



85



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**Milagro** ✓

@NewMediaaaaa

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@ChelseaaaaaTn

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**datacollection\_...**  
@qe\_datacollect

...



# **EXHIBIT 113-B**

**Transcript:**  
**File: 00005\_milagrogramz-says-shes-never-helping-tory-or-any-other-**  
**man-agai.mp3**

Speaker	Time	Dialogue
Milagro:	00:00	--still fucking there. And I hate, and I told y'all I could feel it creeping in, but I hate that I know that I will never go hard for a nigga again in my fucking life, ever, ever. And to have somebody like me, I know how important that is. But when I tell you this has absolutely jaded me, and I would never get up and dah, dah, dah, and ride for a nigga, regardless of if God, I don't want to say I'm going to go against my God because I feel like God for Tory in my heart. But if it came again, bitch, I go against, I fight it until God made it to what I just couldn't ignore it.
Milagro:	00:47	But I was asking why we were going through everything. Why won't nobody say nothing? Why won't nobody stand? Why won't nobody do this and that? Why, why, why?
Milagro:	00:55	And then you live and you see. And that's really unfortunate when you got a bitch with heart that's willing. But fool me once, shame on you, fool me twice. Bitch, can't get fooled again, so.
Milagro:	01:10	I hate every nigga that won't have my support moving forward, that's what I hate.
Milagro:	01:15	Honestly, and truly, I hate every nigga that won't have a Milagro in that corner. And I hate all the people that took a Milagro for granted, too. I appreciate you so much. I'm finna going to go and smoke. I love you.
		END OF AUDIO

# **EXHIBIT 114**

C. MCDOWELL  
07.25.25

**Exhibit 114**

RONNY ZAVOSKY

Document title: Advisory Members — Unite The People Inc.

Capture URL: <https://unitethepeople.org/advisory-members>

Page loaded at (UTC): Wed, 23 Jul 2025 18:38:33 GMT

Capture timestamp (UTC): Wed, 23 Jul 2025 18:39:19 GMT

Capture tool: 10.58.0

Collection server IP: 54.145.42.72

Browser engine: Mozilla/5.0 (X11; Linux x86\_64) AppleWebKit/537.36 (KHTML, like Gecko) Chrome/138.0.7204.97 Safari/537.36

Operating system: Linux (Node 22.17.0)

PDF length: 7

Capture ID: mSgigqjh6JeoLqDb6eu6ip

Display Name: brandondietzman



# Advisory Members



## CEASAR MCDOWELL

A formerly incarcerated person who has dedicated his life to assisting the disadvantaged community as well as promote social justice in the United States. A native of Rialto California Ceasar has and is while incarcerated and since released dedicated his himself to assisting incarcerated and formerly incarcerated people with legal issues and working to Unite the People, all the People across the United states and beyond.



## MITCH MCDOWELL

Mitchell McDowell is the founding member of Unite the People. His vision for the organization is to advance social justice in the United States through organizing in the community service sector and promoting affordable legal services for all. Mitchell has 25 years of experience as the owner of a bail assistance organization, where he helped reunite hundreds of families and restore the presumption of innocence for the accused, and has also managed several community service organizations before founding UTP. Mitch also served in the United States

How can I help you?







several community service organizations before founding UTP.

Mitch also served in the United States military reserves.



#### DANIELLE FROST

A Los Angeles native, Danielle Frost is the CEO of A Frostchild Production and a Co-Founder of Athletes For Impact. Ms. Frost has over 20 years of experience working closely with professional athletes most notably in the production of purpose-driven sports and entertainment events with an emphasis on community and charitable efforts. Danielle produces impactful events and specializes in strategic partnerships, sponsorship, brand integration, marketing and experiential activations with many leading brands and Fortune 500 companies. Her work has garnered substantial funding to support positive efforts and initiatives in the areas of, but not limited to hunger, community resources, health, fitness, and education both nationally and internationally. Danielle has spoken at Harvard University to discuss the pathways to activism for the aspiring professional. She has been recognized as a pioneer of events in Las Vegas, NV through her work and granted a key to the city. She has also been recognized by the Anguilla Parliamentary Secretary of Sports for her international work in Anguilla with the Youth Sports Foundation and was most recently awarded the Sports Event Producer of the year by the Sports & Music Reunion.

As a co-founder of Athletes For Impact, Danielle works together with grassroots organizations and professional athletes that are committed to social change by creating mindful and informative campaigns to educate and activate community efforts towards justice. She is the co-creator and producer of the Athletes For Impact Awards, an event that honors and recognizes athletes and organizations for their work and impact in the community and in the world. Danielle has been granted a Congressional Certificate of Recognition by the United States Congress for her social action locally and nationally with Athletes For Impact.

Danielle serves as a proud board member of United The People, an organization that offers low-cost legal services and provides community resources for under served communities. She believes the time you spend

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Danielle serves as a proud board member of Unite the People, a non-profit organization that offers low-cost legal services and provides community resources for under served communities. She believes the time you spend every day working should be a reflection of your purpose, passion, integrity, character, and the fundamentals of what you truly believe in. As a well-recognized professional in the business of sports, entertainment, and activism, she takes pride in her work and is honored to collaborate alongside many conscious change-makers of our time. Danielle enjoys spending time with her family, helping others, and is a dedicated member of her community.



#### MARI RONQUILLO

Classy, savvy, driven and intelligent, Mari Ronquillo has proven to be one of the leading publicists and business owners for over a decade in the field of public relations. Breaking barriers not only as a woman making moves in a male dominated arena, but Ronquillo stands out as younger than many others in the game as well as a leading Latina in the industry. Representing A-list clients from Billboard Icon Award recipient and Hollywood Walk of Fame singer/actress Jennifer Lopez, Grammy Award-winning artist Chris Brown, Academy Award-winning actress Halle Berry, Latin Grammy Award- nominee Sech, Tainy, T-Pain, French Montana, Lakeith Stanfield and a number of others including heavy hitting corporations such as Live Nation, Pepsi and Seagrams Escapes, it is no mystery why that Lyme Lite Media, run by Mari Ronquillo, is one of the first word of mouth sought after boutique public relation firms recommended.

Ronquillo established Lyme Lite Media and Public Relations in 2007. She is no stranger to hard work and dedication as she is the product of two immigrant parents. Her mother, originally from Mexico, and father, originally from the Philippines, instilled these characteristics as well as passion into her at an early age. It is something that carried over into her everyday life as well as business practices. Earning a rare position as an intern producer at 93.5 KDAY in Los Angeles, CA, Mari realized that her gift was far more than production, but to help artists generate exposure. These gifts were brought even more to the forefront as she was given the opportunity to be the event coordinator for one of the biggest concerts that year. Stepping out on faith, after graduating from California State University, Northridge, she founded Lyme Lite Media Production, Ronquillo birthed a new era of public relations.

Her impact was felt as she worked Tyga, his hit single "Rack City" and his Grammy-nominated album, "My Love Story" to name a few.

How can I help you?





given the opportunity to be the event coordinator for one of the biggest concerts that year. Stepping out on faith, after graduating from California State University, Northridge with a B.A. in Multi-Media Production, Ronquillo birthed her company. Her immediate impact was felt as she worked Tyga, his hit single "Rack City" and his Careless World Tour, catapulting his popularity to new heights. From there Lyme Lite Media became the publicity team for countless top trending superstars and businesses.

Not only is Mari a successful businesswoman, but she also wears the title of mother as her other full-time position; raising her amazing six year old son. The mompreneur is extremely passionate about helping women of color like herself navigate their journey in the Entertainment Industry. A veteran in the game, Ronquillo continues to lead by example and touch the lives of everyone she encounters.



#### TORY LANEZ

Daystar Peterson, better known by his stage name Tory Lanez, is a very prominent rapper, singer, and record producer. Mr. Peterson uses his platform to help Unite the People and his community bring attention to issues such as social justice, and prison reform. Mr. Peterson has played a large role in spreading the word of Unite the People's causes and push for legislation change.

Tory Lanez, is a Canadian rapper, singer, and record producer. He received initial recognition from the mixtape Conflicts of My Soul: The 416 Story, released in August 2013. In 2015, Tory Lanez signed to record producer Benny Blanco's Mad Love Records through Interscope Records.

Mr. Lanez's debut studio album, I Told You (2016), included the singles "Say It" and "Luv", which peaked at number 23 and 19 on the Billboard Hot 100, respectively. In 2018, Mr. Lanez released his second and third studio albums, Memories Don't Die and Love Me Now?. His fourth studio album Chixtape 5 (2019) peaked at number 2 on the US Billboard 200. In 2020, he released his fifth studio album Daystar, which debuted at number 10 on the Billboard 200 and featured controversial responses to the allegations of him shooting fellow rapper Megan Thee Stallion earlier that year.

Mr. Lanez has won and been nominated for many awards and accolades. He received a Grammy Award nomination for his song "LUV" as well as four Juno Awards.

How can I help you?



#### TODD PERRY II



#### TODD PERRY II

Todd L. Perry II joins *Unite The People* as a board member and will focus efforts on building out a presence for the non-profit in Pennsylvania where he intends to commit his time to helping serve those who are adversely affected by the justice system in Pennsylvania. Born and raised in Philadelphia, PA Todd had an early fascination with business and music. He went on to attend Morehouse College in Atlanta, GA where he earned a Bachelor's Degree in English.

Todd is currently a music executive and entrepreneur currently serving as Vice President Of A&R and Business Development for Create Music Group (*2020 Inc. Magazine #2 Fastest Growing Company in The United States*). Todd began his music career in 2012 under the direction of music executive, Laney Stewart (Tricky Stewart, The-Dream) where he started as an intern for Music Gallery / UMPG Publishing Co. Todd assisted Laney in building and developing songwriters and producers who went on to pen hits for Meek Mill, Jeremih, Jesse McCartney, G-Eazy, Ty Dolla Sign and many others.

In 2018, Todd joined management company Mouvement and built out an A&R department that led to creating records for Chris Brown (Heartbreak On A Full Moon, 2x Platinum), Tinashe, Cat Dealers, Steve Aoki and The-Dream.

Todd joined Create Music Group as Vice President Of A&R in 2020 and is most noted for signing Tory Lanez and releasing, *DAYSTAR*, which debuted at #10 on the Billboard Top 200 Albums.

Todd has a passion for advocacy and providing resources for those who aren't afforded fair opportunities. Todd intends on leveraging his network in politics and music to help make a difference in the lives of incarcerated black and latino inmates.



#### TNI JACKSON

Tni Jackson was born and raised in Los Angeles, but has called the Bay Area her home for over 25 years.

After graduating from Cal Poly, San Luis Obispo, she moved to the Bay Area and started her long and diverse career in real estate. She started out as a Real Estate Appraiser for a bank, before opening her own Real Estate Appraisal. She obtained her California Real Estate Sales License and participated on a team that specialized in assisting first-time buyers with their dream of

How can I help you?





**TNI JACKSON**

Tni Jackson was born and raised in Los Angeles, but has called the Bay Area her home for over 25 years.

After graduating from Cal Poly, San Luis Obispo, she moved to the Bay Area and started her long and diverse career in real estate. She started out as a Real Estate Appraiser for a bank, before opening her own Real Estate Appraisal Company. She also has a California Real Estate Sales License and participated on a team that specialized in assisting first-time buyers with their dream of purchasing and owning a home. Education is important to her. She volunteered for years in STEM educational programs for underrepresented K-12 students.

Tni is a proud mom of two beautiful children. Her daughter graduated from Purdue University with a degree in Biological Engineering and her son is a Junior at San Jose State majoring in Materials Engineering. She is honored to serve as an Advisory Member and looks forward to bringing her work ethic and passion to Unite the People.

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555 E Ocean Blvd Suite 205  
Long Beach, CA 90802

TEL (888)-245-9393  
[info@unitethepeople.org](mailto:info@unitethepeople.org)

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# **EXHIBIT 115**

Sonstige

Dec 9, 2022 at 5:54 PM

allegedly claimed at one point that he was woken up by the gunshots and didn't see the shooting, Butt held the court. "Every time he gave a statement, the details shifted," Butt said. "He's grossly unreliable."

## TRENDING

### Barkstreet Boy Nick Carter Sued for Alleged Rape of 17-Year-Old Girl On Tour Bus

**Kyrsten Sinema Leaves  
Democratic Party**

**Trump Bids for Not-B-Dinner W**

Los Angeles County Judge David Thornton said that as long as prosecutors have a good faith belief Harris will testify, he would allow them to state what they believe the witness will show. He also said another witness might be able to lay the necessary foundation for the testimony of the "other" witness nearby. The witness previously said it appeared to him that the murder flash was closest to the non-victim female at the time of the shooting.

EXHIBIT 115  
WIT: McDowell  
DATE: 7-25-25  
RONNY ZAVOSKY, CSR 12359

On Monday, prosecutors asked Judge Herlihy to rule that if Perumian declines to testify, his lawyers should be barred from pursuing a "third-party culpability defense" in which they might name a different possible shooter. Deputy District Attorney Alexander Rott said the statement from the eyewitness on the balcony was all over the place and that the witness has finally stated he "doesn't know who the shooter is."

According to Bott, the man's first statement claimed that "nine people got out of the car."

allegedly claimed at one point that he was soaked up by the gunshots and didn't see the shooting. But he told the court. "Every time he









SP

Dec 12, 2022 at 11:08 AM

Sorry Mila. 15th floor. Call me if you need me before 10

Dec 21, 2022 at 8:58 PM

Jan 5, 2023 at 1:47 PM

Just sent the email over

DEF MG - 000219

Jan 5, 2023 at 1:47 PM

DEF

10

DEF



# **EXHIBIT 116**



efile Public Visual Render

ObjectID: 202410309349300101 - Submission: 2024-01-30

TIN: 82-2750315

Form 990

Return of Organization Exempt From Income Tax

OMB No. 1545-0047

2021

Open to Public Inspection

Under section 501(c), 527, or 4947(a)(1) of the Internal Revenue Code (except private foundations)

Do not enter social security numbers on this form as it may be made public.

Go to [www.irs.gov/Form990](https://www.irs.gov/Form990) for instructions and the latest information.

Department of the Treasury  
Internal Revenue Service

**A** For the 2021 calendar year, or tax year beginning 01-01-2021 , and ending 12-31-2021

**B** Check if applicable:  
☐ Address change  
☐ Name change  
☐ Initial return  
☐ Final return/terminated  
☐ Amended return  
☐ Application pending

**C** Name of organization  
UNITE THE PEOPLE INC  
**Doing business as**  
**Number and street (or P.O. box if mail is not delivered to street address)** Room/suite  
555 E OCEAN BLVD STE 205  
**City or town, state or province, country, and ZIP or foreign postal code**  
Long Beach, CA 90802

**D** Employer identification number  
82-2750315  
**E** Telephone number  
**G** Gross receipts \$ 429,225

**F** Name and address of principal officer:  
MITCHELL McDOWELL

**H(a)** Is this a group return for subordinates? ☐ Yes ☒ No  
**H(b)** Are all subordinates included? ☐ Yes ☐ No  
If "No," attach a list. See instructions.  
**H(c)** Group exemption number ▶

**I** Tax-exempt status: ☒ 501(c)(3) ☐ 501(c) ( ) ◀(insert no.) ☐ 4947(a)(1) or ☐ 527

**J** Website: ▶ www.unitepeople.org

**K** Form of organization: ☒ Corporation ☐ Trust ☐ Association ☐ Other ▶

**L** Year of formation: 2017 **M** State of legal domicile: CA

Part I Summary			
Activities & Governance	<b>1</b> Briefly describe the organization's mission or most significant activities: PROVIDE ADVOCACY AND LEGAL SERVICES TO LOW-INCOME INDIVIDUALS AND FAMILIES.		
	<b>2</b> Check this box <input type="checkbox"/>		
	<b>3</b> Number of voting members of the governing body (Part VI, line 1a)	<b>3</b>	3
	<b>4</b> Number of independent voting members of the governing body (Part VI, line 1b)	<b>4</b>	3
	<b>5</b> Total number of individuals employed in calendar year 2021 (Part V, line 2a)	<b>5</b>	5
	<b>6</b> Total number of volunteers (estimate if necessary)	<b>6</b>	
	<b>7a</b> Total unrelated business revenue from Part VIII, column (C), line 12	<b>7a</b>	0
	<b>b</b> Net unrelated business taxable income from Form 990-T, Part I, line 11	<b>7b</b>	0
Revenue	<b>8</b> Contributions and grants (Part VIII, line 1h)	Prior Year	Current Year
	<b>9</b> Program service revenue (Part VIII, line 2g)	674,782	429,225
	<b>10</b> Investment income (Part VIII, column (A), lines 3, 4, and 7d )		0
	<b>11</b> Other revenue (Part VIII, column (A), lines 5, 6d, 8c, 9c, 10c, and 11e)		0
	<b>12</b> Total revenue—add lines 8 through 11 (must equal Part VIII, column (A), line 12)	674,782	429,225
Expenses	<b>13</b> Grants and similar amounts paid (Part IX, column (A), lines 1–3 )	60,000	0
	<b>14</b> Benefits paid to or for members (Part IX, column (A), line 4)		0
	<b>15</b> Salaries, other compensation, employee benefits (Part IX, column (A), lines 5–10)	423,916	273,196
	<b>16a</b> Professional fundraising fees (Part IX, column (A), line 11e)		0
	<b>b</b> Total fundraising expenses (Part IX, column (D), line 25) ▶0		
	<b>17</b> Other expenses (Part IX, column (A), lines 11a–11d, 11f–24e)	164,968	244,783
	<b>18</b> Total expenses. Add lines 13–17 (must equal Part IX, column (A), line 25)	648,884	517,979
Net Assets or Fund Balances	<b>19</b> Revenue less expenses. Subtract line 18 from line 12	25,898	-88,754
		Beginning of Current Year	End of Year
	<b>20</b> Total assets (Part X, line 16)	50,320	0
	<b>21</b> Total liabilities (Part X, line 26)		0
	<b>22</b> Net assets or fund balances. Subtract line 21 from line 20	50,320	0

C. MCDOWELL  
07.25.25  
**Exhibit 116**  
RONNY ZAVOSKY

Part II

Signature Block

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.

Sign Here

Signature of officer

2024-01-19

Date

MITCHELL McDOWELL, BOARD CHAIR

Type or print name and title

Paid Preparer Use Only

Print/Type preparer's name

Preparer's signature

Date

Check ☐ if self-employed

PTIN P00427038

Firm's name ▶ Tax Consultants

Firm's EIN ▶ 33-0773162

Firm's address ▶ 333 City Blvd W 3rd Floor

Phone no. (714) 244-8070

Orange, CA 92868

May the IRS discuss this return with the preparer shown above? (see instructions) ☒ Yes ☐ No

For Paperwork Reduction Act Notice, see the separate instructions. Cat. No. 11282Y Form 990 (2021)

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Part III

Statement of Program Service Accomplishments

Check if Schedule O contains a response or note to any line in this Part III ☐

1

Briefly describe the organization's mission:

PROVIDE ADVOCACY AND LEGAL SERVICES TO LOW-INCOME INDIVIDUALS AND FAMILIES.

2

Did the organization undertake any significant program services during the year which were not listed on the prior Form 990 or 990-EZ? ☐ Yes ☒ No

If "Yes," describe these new services on Schedule O.

3

Did the organization cease conducting, or make significant changes in how it conducts, any program services? ☐ Yes ☒ No

If "Yes," describe these changes on Schedule O.

4

Describe the organization's program service accomplishments for each of its three largest program services, as measured by expenses. Section 501(c)(3) and 501(c)(4) organizations are required to report the amount of grants and allocations to others, the total expenses, and revenue, if any, for each program service reported.

4a

(Code: ) (Expenses \$ 517,979 including grants of \$ ) (Revenue \$ 429,225 )

LEGAL SERVICES TO LOW-INCOME INDIVIDUALS AND FAMILIES IN NEED.

4b

(Code: ) (Expenses \$ including grants of \$ ) (Revenue \$ )

4c

(Code: ) (Expenses \$ including grants of \$ ) (Revenue \$ )

4d

Other program services (Describe in Schedule O.)

(Expenses \$ including grants of \$ ) (Revenue \$ )

4e




Total program service expenses ▶ 517,979



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Page **3**

Part IV **Checklist of Required Schedules**

	Yes	No
<b>1</b> Is the organization described in section 501(c)(3) or 4947(a)(1) (other than a private foundation)? If "Yes," complete Schedule A  . . . . .	<b>1</b> Yes	
<b>2</b> Is the organization required to complete Schedule B, Schedule of Contributors? See instructions. . . . .	<b>2</b>	No
<b>3</b> Did the organization engage in direct or indirect political campaign activities on behalf of or in opposition to candidates for public office? If "Yes," complete Schedule C, Part I . . . . .	<b>3</b>	No
<b>4 Section 501(c)(3) organizations.</b> Did the organization engage in lobbying activities, or have a section 501(h) election in effect during the tax year? If "Yes," complete Schedule C, Part II . . . . .	<b>4</b>	No
<b>5</b> Is the organization a section 501(c)(4), 501(c)(5), or 501(c)(6) organization that receives membership dues, assessments, or similar amounts as defined in Rev. Proc. 98-19? If "Yes," complete Schedule C, Part III . . . . .	<b>5</b>	No
<b>6</b> Did the organization maintain any donor advised funds or any similar funds or accounts for which donors have the right to provide advice on the distribution or investment of amounts in such funds or accounts? If "Yes," complete Schedule D, Part I . . . . .	<b>6</b>	No
<b>7</b> Did the organization receive or hold a conservation easement, including easements to preserve open space, the environment, historic land areas, or historic structures? If "Yes," complete Schedule D, Part II . . . . .	<b>7</b>	No
<b>8</b> Did the organization maintain collections of works of art, historical treasures, or other similar assets? If "Yes," complete Schedule D, Part III . . . . .	<b>8</b>	No
<b>9</b> Did the organization report an amount in Part X, line 21 for escrow or custodial account liability; serve as a custodian for amounts not listed in Part X; or provide credit counseling, debt management, credit repair, or debt negotiation services? If "Yes," complete Schedule D, Part IV . . . . .	<b>9</b>	No
<b>10</b> Did the organization, directly or through a related organization, hold assets in temporarily restricted endowments, permanent endowments, or quasi endowments? If "Yes," complete Schedule D, Part V . . . . .	<b>10</b>	No
<b>11</b> If the organization's answer to any of the following questions is "Yes," then complete Schedule D, Parts VI, VII, VIII, IX, or X, as applicable.		
<b>a</b> Did the organization report an amount for land, buildings, and equipment in Part X, line 10? If "Yes," complete Schedule D, Part VI. . . . .	<b>11a</b>	No
<b>b</b> Did the organization report an amount for investments—other securities in Part X, line 12 that is 5% or more of its total assets reported in Part X, line 16? If "Yes," complete Schedule D, Part VII . . . . .	<b>11b</b>	No
<b>c</b> Did the organization report an amount for investments—program related in Part X, line 13 that is 5% or more of its total assets reported in Part X, line 16? If "Yes," complete Schedule D, Part VIII . . . . .	<b>11c</b>	No
<b>d</b> Did the organization report an amount for other assets in Part X, line 15 that is 5% or more of its total assets reported in Part X, line 16? If "Yes," complete Schedule D, Part IX . . . . .	<b>11d</b>	No
<b>e</b> Did the organization report an amount for other liabilities in Part X, line 25? If "Yes," complete Schedule D, Part X . . . . .	<b>11e</b>	No
<b>f</b> Did the organization's separate or consolidated financial statements for the tax year include a footnote that addresses the organization's liability for uncertain tax positions under FIN 48 (ASC 740)? If "Yes," complete Schedule D, Part X . . . . .	<b>11f</b>	No
<b>12a</b> Did the organization obtain separate, independent audited financial statements for the tax year? If "Yes," complete Schedule D, Parts XI and XII  . . . . .	<b>12a</b>	No
<b>b</b> Was the organization included in consolidated, independent audited financial statements for the tax year? If "Yes," and if the organization answered "No" to line 12a, then completing Schedule D, Parts XI and XII is optional  . . . . .	<b>12b</b> Yes	
<b>13</b> Is the organization a school described in section 170(b)(1)(A)(ii)? If "Yes," complete Schedule E . . . . .	<b>13</b>	No
<b>14a</b> Did the organization maintain an office, employees, or agents outside of the United States? . . . . .	<b>14a</b>	No
<b>b</b> Did the organization have aggregate revenues or expenses of more than \$10,000 from grantmaking, fundraising, business, investment, and program service activities outside the United States, or aggregate foreign investments valued at \$100,000 or more? If "Yes," complete Schedule F, Parts I and IV . . . . .	<b>14b</b>	No
<b>15</b> Did the organization report on Part IX, column (A), line 3, more than \$5,000 of grants or other assistance to or for any foreign organization? If "Yes," complete Schedule F, Parts II and IV . . . . .	<b>15</b>	No
<b>16</b> Did the organization report on Part IX, column (A), line 3, more than \$5,000 of aggregate grants or other assistance to or for foreign individuals? If "Yes," complete Schedule F, Parts III and IV . . . . .	<b>16</b>	No
<b>17</b> Did the organization report a total of more than \$15,000 of expenses for professional fundraising services on Part IX, column (A), lines 6 and 11e? If "Yes," complete Schedule G, Part I. See instructions. . . . .	<b>17</b>	No
<b>18</b> Did the organization report more than \$15,000 total of fundraising event gross income and contributions on Part VIII, lines 1c and 8a? If "Yes," complete Schedule G, Part II . . . . .	<b>18</b>	No
<b>19</b> Did the organization report more than \$15,000 of gross income from gaming activities on Part VIII, line 9a? If "Yes," complete Schedule G, Part III . . . . .	<b>19</b>	No
<b>20a</b> Did the organization operate one or more hospital facilities? If "Yes," complete Schedule H . . . . .	<b>20a</b>	No
<b>b</b> If "Yes" to line 20a, did the organization attach a copy of its audited financial statements to this return? . . . . .	<b>20b</b>	
<b>21</b> Did the organization report more than \$5,000 of grants or other assistance to any domestic organization or domestic government on Part IX, column (A), line 1? If "Yes," complete Schedule I, Parts I and II . . . . .	<b>21</b>	No

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Part IV Checklist of Required Schedules (continued)

	Yes	No
<b>22</b> Did the organization report more than \$5,000 of grants or other assistance to or for domestic individuals on Part IX, column (A), line 2? If "Yes," complete Schedule I, Parts I and III . . . . .	<b>22</b>	No
<b>23</b> Did the organization answer "Yes" to Part VII, Section A, line 3, 4, or 5, about compensation of the organization's current and former officers, directors, trustees, key employees, and highest compensated employees? If "Yes," complete Schedule J . . . . .	<b>23</b>	No
<b>24a</b> Did the organization have a tax-exempt bond issue with an outstanding principal amount of more than \$100,000 as of the last day of the year, that was issued after December 31, 2002? If "Yes," answer lines 24b through 24d and complete Schedule K. If "No," go to line 25a . . . . .	<b>24a</b>	No
<b>b</b> Did the organization invest any proceeds of tax-exempt bonds beyond a temporary period exception? . . . . .	<b>24b</b>	
<b>c</b> Did the organization maintain an escrow account other than a refunding escrow at any time during the year to defease any tax-exempt bonds? . . . . .	<b>24c</b>	
<b>d</b> Did the organization act as an "on behalf of" issuer for bonds outstanding at any time during the year? . . . . .	<b>24d</b>	
<b>25a Section 501(c)(3), 501(c)(4), and 501(c)(29) organizations.</b> Did the organization engage in an excess benefit transaction with a disqualified person during the year? If "Yes," complete Schedule L, Part I . . . . .	<b>25a</b>	No
<b>b</b> Is the organization aware that it engaged in an excess benefit transaction with a disqualified person in a prior year, and that the transaction has not been reported on any of the organization's prior Forms 990 or 990-EZ? If "Yes," complete Schedule L, Part I . . . . .	<b>25b</b>	No
<b>26</b> Did the organization report any amount on Part X, line 5 or 22 for receivables from or payables to any current or former officer, director, trustee, key employee, creator or founder, substantial contributor, or 35% controlled entity or family member of any of these persons? If "Yes," complete Schedule L, Part II . . . . .	<b>26</b>	No
<b>27</b> Did the organization provide a grant or other assistance to any current or former officer, director, trustee, key employee, creator or founder, substantial contributor, or employee thereof, a grant selection committee member, or to a 35% controlled entity (including an employee thereof) or family member of any of these persons? If "Yes," complete Schedule L, Part III . . . . .	<b>27</b>	No
<b>28</b> Was the organization a party to a business transaction with one of the following parties (see the Schedule L, Part IV instructions for applicable filing thresholds, conditions, and exceptions):		
<b>a</b> A current or former officer, director, trustee, key employee, creator or founder, or substantial contributor? If "Yes," complete Schedule L, Part IV . . . . .	<b>28a</b>	No
<b>b</b> A family member of any individual described in line 28a? If "Yes," complete Schedule L, Part IV . . . . .	<b>28b</b>	No
<b>c</b> A 35% controlled entity of one or more individuals and/or organizations described in line 28a or 28b? If "Yes," complete Schedule L, Part IV . . . . .	<b>28c</b>	No
<b>29</b> Did the organization receive more than \$25,000 in non-cash contributions? If "Yes," complete Schedule M . . . . .	<b>29</b>	No
<b>30</b> Did the organization receive contributions of art, historical treasures, or other similar assets, or qualified conservation contributions? If "Yes," complete Schedule M . . . . .	<b>30</b>	No
<b>31</b> Did the organization liquidate, terminate, or dissolve and cease operations? If "Yes," complete Schedule N, Part I . . . . .	<b>31</b>	No
<b>32</b> Did the organization sell, exchange, dispose of, or transfer more than 25% of its net assets? If "Yes," complete Schedule N, Part II . . . . .	<b>32</b>	No
<b>33</b> Did the organization own 100% of an entity disregarded as separate from the organization under Regulations sections 301.7701-2 and 301.7701-3? If "Yes," complete Schedule R, Part I . . . . .	<b>33</b>	No
<b>34</b> Was the organization related to any tax-exempt or taxable entity? If "Yes," complete Schedule R, Part II, III, or IV, and Part V, line 1 . . . . .	<b>34</b>	No
<b>35a</b> Did the organization have a controlled entity within the meaning of section 512(b)(13)?	<b>35a</b>	No
<b>b</b> If 'Yes' to line 35a, did the organization receive any payment from or engage in any transaction with a controlled entity within the meaning of section 512(b)(13)? If "Yes," complete Schedule R, Part V, line 2 . . . . .	<b>35b</b>	No
<b>36 Section 501(c)(3) organizations.</b> Did the organization make any transfers to an exempt non-charitable related organization? If "Yes," complete Schedule R, Part V, line 2 . . . . .	<b>36</b>	No
<b>37</b> Did the organization conduct more than 5% of its activities through an entity that is not a related organization and that is treated as a partnership for federal income tax purposes? If "Yes," complete Schedule R, Part VI . . . . .	<b>37</b>	No
<b>38</b> Did the organization complete Schedule O and provide explanations on Schedule O for Part VI, lines 11b and 19? <b>Note.</b> All Form 990 filers are required to complete Schedule O. . . . .	<b>38</b>	Yes

Part V Statements Regarding Other IRS Filings and Tax Compliance

Check if Schedule O contains a response or note to any line in this Part V . . . . . ☐

	Yes	No
<b>1a</b> Enter the number reported in box 3 of Form 1096. Enter -0- if not applicable . . . . .	<b>1a</b>	18
<b>b</b> Enter the number of Forms W-2G included on line 1a. Enter -0- if not applicable . . . . .	<b>1b</b>	0
<b>c</b> Did the organization comply with backup withholding rules for reportable payments to vendors and reportable gaming . . . . .		

Part V Statements Regarding Other IRS Filings and Tax Compliance (continued)			
2a Enter the number of employees reported on Form W-3, Transmittal of Wage and Tax Statements, filed for the calendar year ending with or within the year covered by this return . . . . .		2a	5
b If at least one is reported on line 2a, did the organization file all required federal employment tax returns? <b>Note.</b> If the sum of lines 1a and 2a is greater than 250, you may be required to e-file. See instructions.		2b	Yes
3a Did the organization have unrelated business gross income of \$1,000 or more during the year? . . . . .		3a	No
b If "Yes," has it filed a Form 990-T for this year? If "No" to line 3b, provide an explanation in Schedule O . . . . .		3b	
4a At any time during the calendar year, did the organization have an interest in, or a signature or other authority over, a financial account in a foreign country (such as a bank account, securities account, or other financial account)? . . . . .		4a	No
b If "Yes," enter the name of the foreign country: <span style="border-bottom: 1px solid black; display: inline-block; width: 150px;"></span> See instructions for filing requirements for FinCEN Form 114, Report of Foreign Bank and Financial Accounts (FBAR).			
5a Was the organization a party to a prohibited tax shelter transaction at any time during the tax year? . . . . .		5a	No
b Did any taxable party notify the organization that it was or is a party to a prohibited tax shelter transaction?		5b	No
c If "Yes," to line 5a or 5b, did the organization file Form 8886-T? . . . . .		5c	
6a Does the organization have annual gross receipts that are normally greater than \$100,000, and did the organization solicit any contributions that were not tax deductible as charitable contributions? . . . . .		6a	Yes
b If "Yes," did the organization include with every solicitation an express statement that such contributions or gifts were not tax deductible? . . . . .		6b	Yes
7 Organizations that may receive deductible contributions under section 170(c).			
a Did the organization receive a payment in excess of \$75 made partly as a contribution and partly for goods and services provided to the payor? . . . . .		7a	No
b If "Yes," did the organization notify the donor of the value of the goods or services provided? . . . . .		7b	
c Did the organization sell, exchange, or otherwise dispose of tangible personal property for which it was required to file Form 8282? . . . . .		7c	No
d If "Yes," indicate the number of Forms 8282 filed during the year . . . . .		7d	
e Did the organization receive any funds, directly or indirectly, to pay premiums on a personal benefit contract?		7e	No
f Did the organization, during the year, pay premiums, directly or indirectly, on a personal benefit contract? . . . . .		7f	No
g If the organization received a contribution of qualified intellectual property, did the organization file Form 8899 as required? . . . . .		7g	No
h If the organization received a contribution of cars, boats, airplanes, or other vehicles, did the organization file a Form 1098-C? . . . . .		7h	No
8 Sponsoring organizations maintaining donor advised funds. Did a donor advised fund maintained by the sponsoring organization have excess business holdings at any time during the year? . . . . .		8	No
9 Sponsoring organizations maintaining donor advised funds.			
a Did the sponsoring organization make any taxable distributions under section 4966? . . . . .		9a	No
b Did the sponsoring organization make a distribution to a donor, donor advisor, or related person? . . . . .		9b	No
10 Section 501(c)(7) organizations. Enter:			
a Initiation fees and capital contributions included on Part VIII, line 12 . . . . .		10a	
b Gross receipts, included on Form 990, Part VIII, line 12, for public use of club facilities . . . . .		10b	
11 Section 501(c)(12) organizations. Enter:			
a Gross income from members or shareholders . . . . .		11a	
b Gross income from other sources. (Do not net amounts due or paid to other sources against amounts due or received from them.) . . . . .		11b	
12a Section 4947(a)(1) non-exempt charitable trusts. Is the organization filing Form 990 in lieu of Form 1041?		12a	
b If "Yes," enter the amount of tax-exempt interest received or accrued during the year.		12b	
13 Section 501(c)(29) qualified nonprofit health insurance issuers.			
a Is the organization licensed to issue qualified health plans in more than one state? . . . . . <b>Note.</b> See the instructions for additional information the organization must report on Schedule O.		13a	
b Enter the amount of reserves the organization is required to maintain by the states in which the organization is licensed to issue qualified health plans . . . . .		13b	
c Enter the amount of reserves on hand . . . . .		13c	
14a Did the organization receive any payments for indoor tanning services during the tax year? . . . . .		14a	No

b	If "Yes," has it filed a Form 720 to report these payments? If "No," provide an explanation in Schedule O . . . . .	14b		
15	Is the organization subject to the section 4960 tax on payment(s) of more than \$1,000,000 in remuneration or excess parachute payment(s) during the year? . . . . . If "Yes," see the instructions and file Form 4720, Schedule N.	15		No
16	Is the organization an educational institution subject to the section 4968 excise tax on net investment income? . . . . . If "Yes," complete Form 4720, Schedule O.	16		No
17	<b>Section 501(c)(21) organizations.</b> Did the trust, any disqualified person, or mine operator engage in any activities that would result in the imposition of an excise tax under section 4951, 4952, or 4953? . . . . . If "Yes," complete Form 6069.	17		

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Part VI **Governance, Management, and Disclosure.** For each "Yes" response to lines 2 through 7b below, and for a "No" response to lines 8a, 8b, or 10b below, describe the circumstances, processes, or changes in Schedule O. See instructions.  
Check if Schedule O contains a response or note to any line in this Part VI ☒

**Section A. Governing Body and Management**

		Yes	No
1a	Enter the number of voting members of the governing body at the end of the tax year . . . . . If there are material differences in voting rights among members of the governing body, or if the governing body delegated broad authority to an executive committee or similar committee, explain in Schedule O.		
1b	Enter the number of voting members included in line 1a, above, who are independent . . . . .		
2	Did any officer, director, trustee, or key employee have a family relationship or a business relationship with any other officer, director, trustee, or key employee? . . . . .		No
3	Did the organization delegate control over management duties customarily performed by or under the direct supervision of officers, directors or trustees, or key employees to a management company or other person? . . . . .		No
4	Did the organization make any significant changes to its governing documents since the prior Form 990 was filed? . . . . .		No
5	Did the organization become aware during the year of a significant diversion of the organization's assets? . . . . .		No
6	Did the organization have members or stockholders? . . . . .		No
7a	Did the organization have members, stockholders, or other persons who had the power to elect or appoint one or more members of the governing body? . . . . .		No
7b	Are any governance decisions of the organization reserved to (or subject to approval by) members, stockholders, or persons other than the governing body? . . . . .		No
8	Did the organization contemporaneously document the meetings held or written actions undertaken during the year by the following:		
8a	The governing body? . . . . .	Yes	
8b	Each committee with authority to act on behalf of the governing body? . . . . .	Yes	
9	Is there any officer, director, trustee, or key employee listed in Part VII, Section A, who cannot be reached at the organization's mailing address? If "Yes," provide the names and addresses in Schedule O . . . . .		No

**Section B. Policies** (This Section B requests information about policies not required by the Internal Revenue Code.)

	Yes	No
10a	Did the organization have local chapters, branches, or affiliates? . . . . .	No
10b	If "Yes," did the organization have written policies and procedures governing the activities of such chapters, affiliates, and branches to ensure their operations are consistent with the organization's exempt purposes? . . . . .	
11a	Has the organization provided a complete copy of this Form 990 to all members of its governing body before filing the form? . . . . .	Yes
11b	Describe on Schedule O the process, if any, used by the organization to review this Form 990. . . . .	
12a	Did the organization have a written conflict of interest policy? If "No," go to line 13 . . . . .	Yes
12b	Were officers, directors, or trustees, and key employees required to disclose annually interests that could give rise to conflicts? . . . . .	Yes
12c	Did the organization regularly and consistently monitor and enforce compliance with the policy? If "Yes," describe on Schedule O how this was done . . . . .	Yes
13	Did the organization have a written whistleblower policy? . . . . .	Yes
14	Did the organization have a written document retention and destruction policy? . . . . .	Yes
15	Did the process for determining compensation of the following persons include a review and approval by independent persons, comparability data, and contemporaneous substantiation of the deliberation and decision?	
15a	The organization's CEO, Executive Director, or top management official . . . . .	Yes
15b	Other officers or key employees of the organization . . . . . If "Yes" to line 15a or 15b, describe the process on Schedule O. See instructions.	Yes
16a	Did the organization invest in, contribute assets to, or participate in a joint venture or similar arrangement with a taxable entity during the year? . . . . .	No
16b	If "Yes," did the organization follow a written policy or procedure requiring the organization to evaluate its participation in joint venture arrangements under applicable federal tax law, and take steps to safeguard the organization's exempt . . . . .	

status with respect to such arrangements? . . . . . 549 . . . . .

16b

## Section C. Disclosure

**17** List the states with which a copy of this Form 990 is required to be filed▶

CA

**18** Section 6104 requires an organization to make its Form 1023 (1024 or 1024-A, if applicable), 990, and 990-T (section 501(c)(3)s only) available for public inspection. Indicate how you made these available. Check all that apply.

☐ Own website ☒ Another's website ☒ Upon request ☐ Other (explain in Schedule O)

**19** Describe in Schedule O whether (and if so, how) the organization made its governing documents, conflict of interest policy, and financial statements available to the public during the tax year.

**20** State the name, address, and telephone number of the person who possesses the organization's books and records:

▶ MITCHELL McDOWELL 555 E OCEAN BLVD STE 205 Long Beach, CA 90802 (415) 377-6575

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Part VII **Compensation of Officers, Directors, Trustees, Key Employees, Highest Compensated Employees, and Independent Contractors**

Check if Schedule O contains a response or note to any line in this Part VII ☐

## Section A. Officers, Directors, Trustees, Key Employees, and Highest Compensated Employees

**1a** Complete this table for all persons required to be listed. Report compensation for the calendar year ending with or within the organization's tax year.

- List all of the organization's **current** officers, directors, trustees (whether individuals or organizations), regardless of amount of compensation. Enter -0- in columns (D), (E), and (F) if no compensation was paid.
  - List all of the organization's **current** key employees, if any. See the instructions for definition of "key employee."
  - List the organization's five **current** highest compensated employees (other than an officer, director, trustee or key employee) who received reportable compensation (box 5 of Form W-2, Form 1099-MISC, and/or box 1 of Form 1099-NEC) of more than \$100,000 from the organization and any related organizations.
  - List all of the organization's **former** officers, key employees, or highest compensated employees who received more than \$100,000 of reportable compensation from the organization and any related organizations.
  - List all of the organization's **former directors or trustees** that received, in the capacity as a former director or trustee of the organization, more than \$10,000 of reportable compensation from the organization and any related organizations.
- See the instructions for the order in which to list the persons above.

☒ Check this box if neither the organization nor any related organization compensated any current officer, director, or trustee.

[illegible]

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**Part VII      Section A. Officers, Directors, Trustees, Key Employees, and Highest Compensated Employees** *(continued)*

2 Total number of individuals (including but not limited to those listed above) who received more than \$100,000 of reportable compensation from the organization ► 0

## Section B. Independent Contractors

- <https://projects.propublica.org/nonprofits/organizations/822750315/202410309349300101/full>






(A) Name and business address	(B) Description of services	(C) Compensation
2 Total number of independent contractors (including but not limited to those listed above) who received more than \$100,000 of compensation from the organization ▶		

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Part VIII Statement of Revenue

Check if Schedule O contains a response or note to any line in this Part VIII . . . . . ☐

	(A) Total revenue	(B) Related or exempt function revenue	(C) Unrelated business revenue	(D) Revenue excluded from tax under sections 512 - 514
 Federated campaigns . . . . . 1a				
 Contributions, <del>Gifts, Grants,</del> and Membership dues . . . . . 1b				
 OtherAmt <del>Similar</del> Amounts Fundraising events . . . . . 1c				
d Related organizations . . . . . 1d				
e Government grants (contributions) . . . . . 1e				
f All other contributions, gifts, grants, and similar amounts not included above . . . . . 1f				
g Noncash contributions included in lines 1a - 1f:\$ . . . . . 1g				
h Total. Add lines 1a-1f . . . . . ▶				

		Business Code				
Program Service Revenue	2a LEGAL SERVICES	541100	429,225	429,225		
f All other program service revenue.						
9 Total. Add lines 2a-2f. . . . . ▶			429,225			

3 Investment income (including dividends, interest, and other similar amounts) . . . . . ▶				
4 Income from investment of tax-exempt bond proceeds . . . . . ▶				
5 Royalties . . . . . ▶				
	(i) Real	(ii) Personal		
6a Gross rents	6a			
b Less: rental expenses	6b			
c Rental income or (loss)	6c			

Other Revenue	d Net rental income or (loss) . . . . . ▶					
		(i) Securities (ii) Other				
	7a	Gross amount from sales of assets other than inventory				
	b	Less: cost or other basis and sales expenses				
	7b					
	7c	Gain or (loss)				
	d	Net gain or (loss) . . . . . ▶				
	8a	Gross income from fundraising events (not including \$ _____ of contributions reported on line 1c). See Part IV, line 18 . . . . .				
	8b	Less: direct expenses . . . . .				
	c	Net income or (loss) from fundraising events . . . . . ▶				
	9a	Gross income from gaming activities. See Part IV, line 19 . . . . .				
	9b	Less: direct expenses . . . . .				
	c	Net income or (loss) from gaming activities . . . . . ▶				
10a		Gross sales of inventory, less returns and allowances . . . . .				
	10a					
	10b	Less: cost of goods sold . . . . .				
c	Net income or (loss) from sales of inventory . . . . . ▶					
Miscellaneous Revenue		Business Code				
11a						
b						
c						
d	All other revenue . . . . .					
e	Total. Add lines 11a-11d . . . . . ▶					
12	Total revenue. See instructions . . . . . ▶		429,225	429,225	0	0

Part IX Statement of Functional Expenses				
Section 501(c)(3) and 501(c)(4) organizations must complete all columns. All other organizations must complete column (A).				
Check if Schedule O contains a response or note to any line in this Part IX <input checked="" type="checkbox"/>				
Do not include amounts reported on lines 6b, 7b, 8b, 9b, and 10b of Part VIII.	(A) Total expenses	(B) Program service expenses	(C) Management and general expenses	(D) Fundraising expenses
1 Grants and other assistance to domestic organizations and domestic governments. See Part IV, line 21 . . . . .				
2 Grants and other assistance to domestic individuals. See Part IV, line 22 . . . . .				
3 Grants and other assistance to foreign organizations, foreign governments, and foreign individuals. See Part IV, lines 15 and 16. . . . .				
4 Benefits paid to or for members . . . . .				
5 Compensation of current officers, directors, trustees, and key employees . . . . .				
6 Compensation not included above, to disqualified persons (as defined under section 4958(f)(1)) and persons described in section 4958(c)(3)(B) . . . . .				
7 Other salaries and wages	234,949	234,949		



8 Pension plan accruals and contributions (include section 401(k) and 403(b) employer contributions)				
9 Other employee benefits				
10 Payroll taxes	38,247	38,247		
11 Fees for services (non-employees):				
a Management				
b Legal	6,327	6,327		
c Accounting				
d Lobbying				
e Professional fundraising services. See Part IV, line 17				
f Investment management fees				
g Other (If line 11g amount exceeds 10% of line 25, column (A) amount, list line 11g expenses on Schedule O)	71,326	71,326		
12 Advertising and promotion	23,631	23,631		
13 Office expenses	6,421	6,421		
14 Information technology	14,975	14,975		
15 Royalties				
16 Occupancy	39,558	39,558		
17 Travel				
18 Payments of travel or entertainment expenses for any federal, state, or local public officials	1,495	1,495		
19 Conferences, conventions, and meetings				
20 Interest				
21 Payments to affiliates				
22 Depreciation, depletion, and amortization	5,269	5,269		
23 Insurance	4,518	4,518		
24 Other expenses. Itemize expenses not covered above (List miscellaneous expenses in line 24e. If line 24e amount exceeds 10% of line 25, column (A) amount, list line 24e expenses on Schedule O.)				
a FUNDRAISERS	12,121	12,121		
b POSTAGE	5,383	5,383		
c UTILITIES	13,261	13,261		
d HOMELESS DRIVE	6,053	6,053		
e All other expenses	34,445	34,445		
25 Total functional expenses. Add lines 1 through 24e	517,979	517,979	0	0
26 Joint costs. Complete this line only if the organization reported in column (B) joint costs from a combined educational campaign and fundraising solicitation. Check here <input type="checkbox"/> if following SOP 98-2 (ASC 958-720).				

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Part X Balance Sheet

Check if Schedule O contains a response or note to any line in this Part IX ☐

	(A) Beginning of year		(B) End of year
1 Cash-non-interest-bearing	50,320	1	
2 Savings and temporary cash investments		2	
3 Pledges and grants receivable, net		3	
4 Accounts receivable, net		4	
5 Loans and other receivables from any current or former officer, director, trustee, key employee, creator or founder, substantial contributor, or 35% controlled entity or family member of any of these persons		5	
6 Loans and other receivables from other disqualified persons (as defined under section 4958(f)(1)), and persons described in section 4958(c)(3)(B)		6	

Assets	7	Notes and loans receivable, net . . . . .		7	
	8	Inventories for sale or use . . . . .		8	
	9	Prepaid expenses and deferred charges . . . . .		9	
	10a	Land, buildings, and equipment: cost or other basis. Complete Part VI of Schedule D	10a		
	b	Less: accumulated depreciation	10b		10c
	11	Investments—publicly traded securities . . . . .		11	
	12	Investments—other securities. See Part IV, line 11 . . . . .		12	
	13	Investments—program-related. See Part IV, line 11 . . . . .		13	
	14	Intangible assets . . . . .		14	
	15	Other assets. See Part IV, line 11 . . . . .		15	
16	Total assets. Add lines 1 through 15 (must equal line 33) . . . . .	50,320	16	0	
Liabilities	17	Accounts payable and accrued expenses . . . . .		17	
	18	Grants payable . . . . .		18	
	19	Deferred revenue . . . . .		19	
	20	Tax-exempt bond liabilities . . . . .		20	
	21	Escrow or custodial account liability. Complete Part IV of Schedule D		21	
	22	Loans and other payables to any current or former officer, director, trustee, key employee, creator or founder, substantial contributor, or 35% controlled entity or family member of any of these persons . . . . .		22	
	23	Secured mortgages and notes payable to unrelated third parties . . . . .		23	
	24	Unsecured notes and loans payable to unrelated third parties . . . . .		24	
	25	Other liabilities (including federal income tax, payables to related third parties, and other liabilities not included on lines 17 - 24). Complete Part X of Schedule D		25	
	26	Total liabilities. Add lines 17 through 25 . . . . .	0	26	0
Net Assets or Fund Balances	Organizations that follow FASB ASC 958, check here <input type="checkbox"/> and complete lines 27, 28, 32, and 33.				
	27	Net assets without donor restrictions . . . . .		27	
	28	Net assets with donor restrictions . . . . .		28	
	Organizations that do not follow FASB ASC 958, check here <input checked="" type="checkbox"/> and complete lines 29 through 33.				
	29	Capital stock or trust principal, or current funds . . . . .		29	
	30	Paid-in or capital surplus, or land, building or equipment fund . . . . .		30	
	31	Retained earnings, endowment, accumulated income, or other funds	50,320	31	
	32	Total net assets or fund balances . . . . .	50,320	32	0
	33	Total liabilities and net assets/fund balances . . . . .	50,320	33	0

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Part XI Reconciliation of Net Assets

Check if Schedule O contains a response or note to any line in this Part XI ☐

1	Total revenue (must equal Part VIII, column (A), line 12) . . . . .	1	429,225
2	Total expenses (must equal Part IX, column (A), line 25) . . . . .	2	517,979
3	Revenue less expenses. Subtract line 2 from line 1 . . . . .	3	-88,754
4	Net assets or fund balances at beginning of year (must equal Part X, line 32, column (A)) . . . . .	4	50,320
5	Net unrealized gains (losses) on investments . . . . .	5	
6	Donated services and use of facilities . . . . .	6	6,500
7	Investment expenses . . . . .	7	25,068
8	Prior period adjustments . . . . .	8	6,866
9	Other changes in net assets or fund balances (explain in Schedule O) . . . . .	9	0
10	Net assets or fund balances at end of year. Combine lines 3 through 9 (must equal Part X, line 32, column (B))	10	0

Part XII Financial Statements and Reporting

Check if Schedule O contains a response or note to any line in this Part XII ☐

1	Accounting method used to prepare the Form 990:	<input type="checkbox"/> Cash	<input checked="" type="checkbox"/> Accrual	<input type="checkbox"/> Other		Yes	No
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If the organization changed its method of accounting from a prior year, or checked "Other," explain on Schedule O.

**2a** Were the organization's financial statements compiled or reviewed by an independent accountant?

If "Yes," check a box below to indicate whether the financial statements for the year were compiled or reviewed on a separate basis, consolidated basis, or both:

☐ Separate basis ☒ Consolidated basis ☐ Both consolidated and separate basis

**b** Were the organization's financial statements audited by an independent accountant?

If "Yes," check a box below to indicate whether the financial statements for the year were audited on a separate basis, consolidated basis, or both:

☐ Separate basis ☒ Consolidated basis ☐ Both consolidated and separate basis

**c** If "Yes," to line 2a or 2b, does the organization have a committee that assumes responsibility for oversight of the audit, review, or compilation of its financial statements and selection of an independent accountant?

If the organization changed either its oversight process or selection process during the tax year, explain in Schedule O.

**3a** As a result of a federal award, was the organization required to undergo an audit or audits as set forth in the Single Audit Act and OMB Circular A-133?

**b** If "Yes," did the organization undergo the required audit or audits? If the organization did not undergo the required audit or audits, explain why in Schedule O and describe any steps taken to undergo such audits.

<b>2a</b>	Yes	
<b>2b</b>	Yes	
<b>2c</b>	Yes	
<b>3a</b>		No
<b>3b</b>		

Form **990** (2021)

Form 990 (2021)

**Additional Data**

**Return to Form**

**Software ID:**

**Software Version:**

**Form 990, Special Condition Description:**

Special Condition Description

efile Public Visual Render		ObjectID: 202410309349300101 - Submission: 2024-01-30		TIN: 82-2750315	
<b>SCHEDULE A</b> (Form 990)		<b>Public Charity Status and Public Support</b> Complete if the organization is a section 501(c)(3) organization or a section 4947(a)(1) nonexempt charitable trust. ▶ Attach to Form 990 or Form 990-EZ. ▶ Go to <a href="http://www.irs.gov/Form990">www.irs.gov/Form990</a> for instructions and the latest information.			OMB No. 1545-0047 <b>2021</b> Open to Public Inspection
Department of the Treasury Internal Revenue Service					
Name of the organization UNITE THE PEOPLE INC				Employer identification number 82-2750315	

**Part I Reason for Public Charity Status** (All organizations must complete this part.) See instructions.  
The organization is not a private foundation because it is: (For lines 1 through 12, check only one box.)

- 1 ☐ A church, convention of churches, or association of churches described in **section 170(b)(1)(A)(i).**
- 2 ☐ A school described in **section 170(b)(1)(A)(ii).** (Attach Schedule E (Form 990).)
- 3 ☐ A hospital or a cooperative hospital service organization described in **section 170(b)(1)(A)(iii).**
- 4 ☐ A medical research organization operated in conjunction with a hospital described in **section 170(b)(1)(A)(iii).** Enter the hospital's name, city, and state:
- 5 ☐ An organization operated for the benefit of a college or university owned or operated by a governmental unit described in **section 170(b)(1)(A)(iv).** (Complete Part II.)
- 6 ☐ A federal, state, or local government or governmental unit described in **section 170(b)(1)(A)(v).**
- 7 ☐ An organization that normally receives a substantial part of its support from a governmental unit or from the general public described in **section 170(b)(1)(A)(vi).** (Complete Part II.)
- 8 ☐ A community trust described in **section 170(b)(1)(A)(vi).** (Complete Part II.)
- 9 ☐ An agricultural research organization described in **170(b)(1)(A)(ix)** operated in conjunction with a land-grant college or university or a non-land grant college of agriculture. See instructions. Enter the name, city, and state of the college or university:
- 10 ☒ An organization that normally receives: (1) more than 33 1/3% of its support from contributions, membership fees, and gross receipts from activities related to its exempt functions—subject to certain exceptions, and (2) no more than 33 1/3% of its support from gross investment income and unrelated business taxable income (less section 511 tax) from businesses acquired by the organization after June 30, 1975. See **section 509(a)(2).** (Complete Part III.)
- 11 ☐ An organization organized and operated exclusively to test for public safety. See **section 509(a)(4).**
- 12 ☐ An organization organized and operated exclusively for the benefit of, to perform the functions of, or to carry out the purposes of one or more publicly supported organizations described in **section 509(a)(1)** or **section 509(a)(2).** See **section 509(a)(3).** Check the box on lines 12a through 12d that describes the type of supporting organization and complete lines 12e, 12f, and 12g.
- a ☐ **Type I.** A supporting organization operated, supervised, or controlled by its supported organization(s), typically by giving the supported organization(s) the power to regularly appoint or elect a majority of the directors or trustees of the supporting organization. **You must complete Part IV, Sections A and B.**
- b ☐ **Type II.** A supporting organization supervised or controlled in connection with its supported organization(s), by having control or management of the supporting organization vested in the same persons that control or manage the supported organization(s). **You must complete Part IV, Sections A and C.**
- c ☐ **Type III functionally integrated.** A supporting organization operated in connection with, and functionally integrated with, its supported organization(s) (see instructions). **You must complete Part IV, Sections A, D, and E.**
- d ☐ **Type III non-functionally integrated.** A supporting organization operated in connection with its supported organization(s) that is not functionally integrated. The organization generally must satisfy a distribution requirement and an attentiveness requirement (see instructions). **You must complete Part IV, Sections A and D, and Part V.**
- e ☐ Check this box if the organization received a written determination from the IRS that it is a Type I, Type II, Type III functionally integrated, or Type III non-functionally integrated supporting organization.
- f Enter the number of supported organizations . . . . .
- g Provide the following information about the supported organization(s).

(i) Name of supported organization	(ii) EIN	(iii) Type of organization (described on lines 1- 10 above (see instructions))	(iv) Is the organization listed in your governing document?		(v) Amount of monetary support (see instructions)	(vi) Amount of other support (see instructions)
			Yes	No		
<b>Total</b>						

For Paperwork Reduction Act Notice, see the Instructions for Form 990 or 990-EZ. Cat. No. 11285F Schedule A (Form 990) 2021

**Part II Support Schedule for Organizations Described in Sections 170(b)(1)(A)(iv) and 170(b)(1)(A)(vi)**  
(Complete only if you checked the box on line 5, 7, or 8 of Part I or if the organization failed to qualify under Part III.  
If the organization failed to qualify under the tests listed below, please complete Part III.)

**Section A. Public Support**  
Calendar year

Calendar year (or fiscal year beginning in) ▶	(a) 2017	(b) 2018	(c) 2019	(d) 2020	(e) 2021	(f) Total
1 Gifts, grants, contributions, and membership fees received. (Do not include any "unusual grant.") . . .						
2 Tax revenues levied for the organization's benefit and either paid to or expended on its behalf. . . .						
3 The value of services or facilities furnished by a governmental unit to the organization without charge..						
4 <b>Total.</b> Add lines 1 through 3						
5 The portion of total contributions by each person (other than a governmental unit or publicly supported organization) included on line 1 that exceeds 2% of the amount shown on line 11, column (f) . . .						
6 <b>Public support.</b> Subtract line 5 from line 4.						

Calendar year (or fiscal year beginning in) ▶	(a) 2017	(b) 2018	(c) 2019	(d) 2020	(e) 2021	(f) Total
7 Amounts from line 4. . .						
8 Gross income from interest, dividends, payments received on securities loans, rents, royalties and income from similar sources. . . .						
9 Net income from unrelated business activities, whether or not the business is regularly carried on. .						
10 Other income. Do not include gain or loss from the sale of capital assets (Explain in Part VI.). . .						
11 <b>Total support.</b> Add lines 7 through 10						
12 Gross receipts from related activities, etc. (see instructions) . . . . .					12	
13 <b>First 5 years.</b> If the Form 990 is for the organization's first, second, third, fourth, or fifth tax year as a section 501(c)(3) organization, check this box and <b>stop here</b> . . . . . <input type="checkbox"/>						

Section C. Computation of Public Support Percentage	
14 Public support percentage for 2021 (line 6, column (f) divided by line 11, column (f)) . . . . .	14
15 Public support percentage for 2020 Schedule A, Part II, line 14 . . . . .	15
16a <b>33 1/3% support test—2021.</b> If the organization did not check the box on line 13, and line 14 is 33 1/3% or more, check this box and <b>stop here.</b> The organization qualifies as a publicly supported organization . . . . . <input type="checkbox"/>	
b <b>33 1/3% support test—2020.</b> If the organization did not check a box on line 13 or 16a, and line 15 is 33 1/3% or more, check this box and <b>stop here.</b> The organization qualifies as a publicly supported organization . . . . . <input type="checkbox"/>	
17a <b>10%-facts-and-circumstances test—2021.</b> If the organization did not check a box on line 13, 16a, or 16b, and line 14 is 10% or more, and if the organization meets the "facts-and-circumstances" test, check this box and <b>stop here.</b> Explain in Part VI how the organization meets the "facts-and-circumstances" test. The organization qualifies as a publicly supported organization . . . . . <input type="checkbox"/>	
b <b>10%-facts-and-circumstances test—2020.</b> If the organization did not check a box on line 13, 16a, 16b, or 17a, and line 15 is 10% or more, and if the organization meets the "facts-and-circumstances" test, check this box and <b>stop here.</b> Explain in Part VI how the organization meets the "facts-and-circumstances" test. The organization qualifies as a publicly supported organization . . . . . <input type="checkbox"/>	
18 <b>Private foundation.</b> If the organization did not check a box on line 13, 16a, 16b, 17a, or 17b, check this box and see instructions . . . . . <input type="checkbox"/>	

Part III Support Schedule for Organizations Described in Section 509(a)(2) (Complete only if you checked the box on line 10 of Part I or if the organization failed to qualify under Part II. If the organization fails to qualify under the tests listed below, please complete Part II.)						
Section A. Public Support						
Calendar year (or fiscal year beginning in) ▶	(a) 2017	(b) 2018	(c) 2019	(d) 2020	(e) 2021	(f) Total
1 Gifts, grants, contributions, and membership fees received. (Do not include any "unusual grants.") . . .		45,400	60,000	60,000		165,400
2 Gross receipts from admissions, merchandise sold or services performed, or facilities furnished in any activity that is related to the organization's tax-exempt purpose		4,828				4,828
3 Gross receipts from activities that are not an unrelated trade or business under section 513 . . . . .			400,740	674,782		1,075,522
4 Tax revenues levied for the organization's benefit and either paid						

organization's benefit and either paid to or expended on its behalf. . . .					
5	The value of services or facilities furnished by a governmental unit to the organization without charge				
6	<b>Total.</b> Add lines 1 through 5				
7a	Amounts included on lines 1, 2, and 3 received from disqualified persons				
b	Amounts included on lines 2 and 3 received from other than disqualified persons that exceed the greater of \$5,000 or 1% of the amount on line 13 for the year.				
c	Add lines 7a and 7b. . .				
8	<b>Public support.</b> (Subtract line 7c from line 6.)				
		50,228	460,740	734,782	1,245,750
					1,245,750

Section B. Total Support

Calendar year (or fiscal year beginning in) ▶	(a) 2017	(b) 2018	(c) 2019	(d) 2020	(e) 2021	(f) Total
9	Amounts from line 6. . . .					1,245,750
10a	Gross income from interest, dividends, payments received on securities loans, rents, royalties and income from similar sources. . .					
b	Unrelated business taxable income (less section 511 taxes) from businesses acquired after June 30, 1975.					
c	Add lines 10a and 10b.					
11	Net income from unrelated business activities not included on line 10b, whether or not the business is regularly carried on.					
12	Other income. Do not include gain or loss from the sale of capital assets (Explain in Part VI.) . . .					99,947
13	<b>Total support.</b> (Add lines 9, 10c, 11, and 12.) . . .					1,345,697
14	<b>First 5 years.</b> If the Form 990 is for the organization's first, second, third, fourth, or fifth tax year as a section 501(c)(3) organization, check this box and <b>stop here.</b> . . . . . ▶ <input type="checkbox"/>					

Section C. Computation of Public Support Percentage

15	Public support percentage for 2021 (line 8, column (f) divided by line 13, column (f)) . . . . .	15	92.570 %
16	Public support percentage from 2020 Schedule A, Part III, line 15 . . . . .	16	0 %

Section D. Computation of Investment Income Percentage

17	Investment income percentage for <b>2021</b> (line 10c, column (f) divided by line 13, column (f)) . . . . .	17	0 %
18	Investment income percentage from <b>2020</b> Schedule A, Part III, line 17 . . . . .	18	0 %

- 19a **33 1/3% support tests-2021.** If the organization did not check the box on line 14, and line 15 is more than 33 1/3%, and line 17 is not more than 33 1/3%, check this box and **stop here.** The organization qualifies as a publicly supported organization . . . . . ▶ ☒
- b **33 1/3% support tests-2020.** If the organization did not check a box on line 14 or line 19a, and line 16 is more than 33 1/3% and line 18 is not more than 33 1/3%, check this box and **stop here.** The organization qualifies as a publicly supported organization . . . . . ▶ ☐
- 20 **Private foundation.** If the organization did not check a box on line 14, 19a, or 19b, check this box and see instructions . . . . . ▶ ☐

Schedule A (Form 990) 2021

Part IV Supporting Organizations

(Complete only if you checked a box on line 12 of Part I. If you checked box 12a, of Part I, complete Sections A and B. If you checked box 12b, of Part I, complete Sections A and C. If you checked box 12c, of Part I, complete Sections A, D, and E. If you checked box 12d, of Part I, complete Sections A and D, and complete Part V.)

Section A. All Supporting Organizations

	Yes	No
1		
2		
3a		
b		
3b		
c		



ii Yes, explain in **Part VI** what controls the organization put in place to ensure such use.

- 4a** Was any supported organization not organized in the United States ("foreign supported organization")? If "Yes" and if you checked box 12a or 12b in Part I, answer lines 4b and 4c below.
- b** Did the organization have ultimate control and discretion in deciding whether to make grants to the foreign supported organization? If "Yes," describe in **Part VI** how the organization had such control and discretion despite being controlled or supervised by or in connection with its supported organizations.
- c** Did the organization support any foreign supported organization that does not have an IRS determination under sections 501(c)(3) and 509(a)(1) or (2)? If "Yes," explain in **Part VI** what controls the organization used to ensure that all support to the foreign supported organization was used exclusively for section 170(c)(2)(B) purposes.
- 5a** Did the organization add, substitute, or remove any supported organizations during the tax year? If "Yes," answer lines 5b and 5c below (if applicable). Also, provide detail in **Part VI**, including (i) the names and EIN numbers of the supported organizations added, substituted, or removed; (ii) the reasons for each such action; (iii) the authority under the organization's organizing document authorizing such action; and (iv) how the action was accomplished (such as by amendment to the organizing document).
- b Type I or Type II only.** Was any added or substituted supported organization part of a class already designated in the organization's organizing document?
- c Substitutions only.** Was the substitution the result of an event beyond the organization's control?
- 6** Did the organization provide support (whether in the form of grants or the provision of services or facilities) to anyone other than (i) its supported organizations, (ii) individuals that are part of the charitable class benefited by one or more of its supported organizations, or (iii) other supporting organizations that also support or benefit one or more of the filing organization's supported organizations? If "Yes," provide detail in **Part VI**.
- 7** Did the organization provide a grant, loan, compensation, or other similar payment to a substantial contributor (defined in section 4958(c)(3)(C)), a family member of a substantial contributor, or a 35% controlled entity with regard to a substantial contributor? If "Yes," complete Part I of Schedule L (Form 990) .
- 8** Did the organization make a loan to a disqualified person (as defined in section 4958) not described on line 7? If "Yes," complete Part I of Schedule L (Form 990).
- 9a** Was the organization controlled directly or indirectly at any time during the tax year by one or more disqualified persons, as defined in section 4946 (other than foundation managers and organizations described in section 509(a)(1) or (2))? If "Yes," provide detail in **Part VI**.
- b** Did one or more disqualified persons (as defined on line 9a) hold a controlling interest in any entity in which the supporting organization had an interest? If "Yes," provide detail in **Part VI**.
- c** Did a disqualified person (as defined on line 9a) have an ownership interest in, or derive any personal benefit from, assets in which the supporting organization also had an interest? If "Yes," provide detail in **Part VI**.
- 10a** Was the organization subject to the excess business holdings rules of section 4943 because of section 4943(f) (regarding certain Type II supporting organizations, and all Type III non-functionally integrated supporting organizations)? If "Yes," answer line 10b below.
- b** Did the organization have any excess business holdings in the tax year? (Use Schedule C, Form 4720, to determine whether the organization had excess business holdings).

3c		
4a		
4b		
4c		
5a		
5b		
5c		
6		
7		
8		
9a		
9b		
9c		
10a		
10b		

Schedule A (Form 990) 2021

Schedule A (Form 990) 2021

Page 5

**Part IV Supporting Organizations** (continued)

- 11** Has the organization accepted a gift or contribution from any of the following persons?
- a** A person who directly or indirectly controls, either alone or together with persons described on lines 11b and 11c below, the governing body of a supported organization?
- b** A family member of a person described on 11a above?
- c** A 35% controlled entity of a person described on line 11a or 11b above? If "Yes" to 11a, 11b, or 11c, provide detail in **Part VI**.

	Yes	No
11a		
11b		
11c		

**Section B. Type I Supporting Organizations**

- 1** Did the officers, directors, trustees, or membership of one or more supported organizations have the power to regularly appoint or elect at least a majority of the organization's directors or trustees at all times during the tax year? If "No," describe in **Part VI** how the supported organization(s) effectively operated, supervised, or controlled the organization's activities. If the organization had more than one supported organization, describe how the powers to appoint and/or remove directors or trustees were allocated among the supported organizations and what conditions or restrictions, if any, applied to such powers during the tax year.
- 2** Did the organization operate for the benefit of any supported organization other than the supported organization(s) that operated, supervised, or controlled the supporting organization? If "Yes," explain in **Part VI** how providing such benefit carried out the purposes of the supported organization(s) that operated, supervised or controlled the supporting organization.

	Yes	No
1		
2		

**Section C. Type II Supporting Organizations**

- 1** Were a majority of the organization's directors or trustees during the tax year also a majority of the directors or trustees of

	Yes	No

each of the organization's supported organization(s)? If "No," describe in **Part VI** how control or management of the supporting organization was vested in the same persons that controlled or managed the supported organization(s).

1		
---	--	--

Section D. All Type III Supporting Organizations

	Yes	No
1 Did the organization provide to each of its supported organizations, by the last day of the fifth month of the organization's tax year, (i) a written notice describing the type and amount of support provided during the prior tax year, (ii) a copy of the Form 990 that was most recently filed as of the date of notification, and (iii) copies of the organization's governing documents in effect on the date of notification, to the extent not previously provided?		
1		
2 Were any of the organization's officers, directors, or trustees either (i) appointed or elected by the supported organization(s) or (ii) serving on the governing body of a supported organization? If "No," explain in <b>Part VI</b> how the organization maintained a close and continuous working relationship with the supported organization(s).		
2		
3 By reason of the relationship described in line 2 above, did the organization's supported organizations have a significant voice in the organization's investment policies and in directing the use of the organization's income or assets at all times during the tax year? If "Yes," describe in <b>Part VI</b> the role the organization's supported organizations played in this regard.		
3		

Section E. Type III Functionally-Integrated Supporting Organizations

1 Check the box next to the method that the organization used to satisfy the Integral Part Test during the year (see instructions):

a ☐ The organization satisfied the Activities Test. Complete **line 2** below.

b ☐ The organization is the parent of each of its supported organizations. Complete **line 3** below.

c ☐ The organization supported a governmental entity. Describe in **Part VI** how you supported a government entity (see instructions)

2 Activities Test. Answer lines 2a and 2b below.

	Yes	No
a Did substantially all of the organization's activities during the tax year directly further the exempt purposes of the supported organization(s) to which the organization was responsive? If "Yes," then in <b>Part VI</b> identify those supported organizations and explain how these activities directly furthered their exempt purposes, how the organization was responsive to those supported organizations, and how the organization determined that these activities constituted substantially all of its activities.		
2a		
b Did the activities described on line 2a, above constitute activities that, but for the organization's involvement, one or more of the organization's supported organization(s) would have been engaged in? If "Yes," explain in <b>Part VI</b> the reasons for the organization's position that its supported organization(s) would have engaged in these activities but for the organization's involvement.		
2b		
3 Parent of Supported Organizations. Answer lines 3a and 3b below.		
a Did the organization have the power to regularly appoint or elect a majority of the officers, directors, or trustees of each of the supported organizations? If "Yes" or "No," provide details in <b>Part VI</b> .		
3a		
b Did the organization exercise a substantial degree of direction over the policies, programs and activities of each of its supported organizations? If "Yes," describe in <b>Part VI</b> the role played by the organization in this regard.		
3b		

Schedule A (Form 990) 2021

Part V Type III Non-Functionally Integrated 509(a)(3) Supporting Organizations

- 1 ☐ Check here if the organization satisfied the Integral Part Test as a qualifying trust on Nov. 20, 1970 (explain in **Part VI**). See instructions. All other Type III non-functionally integrated supporting organizations must complete Sections A through E.

Section A - Adjusted Net Income		(A) Prior Year	(B) Current Year (optional)
1 Net short-term capital gain	1		
2 Recoveries of prior-year distributions	2		
3 Other gross income (see instructions)	3		
4 Add lines 1 through 3	4		
5 Depreciation and depletion	5		
6 Portion of operating expenses paid or incurred for production or collection of gross income or for management, conservation, or maintenance of property held for production of income (see instructions)	6		
7 Other expenses (see instructions)	7		
8 Adjusted Net Income (subtract lines 5, 6 and 7 from line 4)	8		
Section B - Minimum Asset Amount		(A) Prior Year	(B) Current Year (optional)
1 Aggregate fair market value of all non-exempt-use assets (see instructions for short tax year or assets held for part of year):	1		
a Average monthly value of securities	1a		
b Average monthly cash balances	1b		
c Fair market value of other non-exempt-use assets	1c		
d Total (add lines 1a, 1b, and 1c)	1d		
e Discount claimed for blockage or other factors			



(explain in detail in **Part VI**):

<b>2</b>	Acquisition indebtedness applicable to non-exempt use assets	<b>2</b>		
<b>3</b>	Subtract line 2 from line 1d	<b>3</b>		
<b>4</b>	Cash deemed held for exempt use. Enter 0.015 of line 3 (for greater amount, see instructions).	<b>4</b>		
<b>5</b>	Net value of non-exempt-use assets (subtract line 4 from line 3)	<b>5</b>		
<b>6</b>	Multiply line 5 by 0.035	<b>6</b>		
<b>7</b>	Recoveries of prior-year distributions	<b>7</b>		
<b>8</b>	<b>Minimum Asset Amount</b> (add line 7 to line 6)	<b>8</b>		
<b>Section C - Distributable Amount</b>				Current Year
<b>1</b>	Adjusted net income for prior year (from Section A, line 8, Column A)	<b>1</b>		
<b>2</b>	Enter 85% of line 1	<b>2</b>		
<b>3</b>	Minimum asset amount for prior year (from Section B, line 8, Column A)	<b>3</b>		
<b>4</b>	Enter greater of line 2 or line 3	<b>4</b>		
<b>5</b>	Income tax imposed in prior year	<b>5</b>		
<b>6</b>	<b>Distributable Amount.</b> Subtract line 5 from line 4, unless subject to emergency temporary reduction (see instructions)	<b>6</b>		
<b>7</b>	<input type="checkbox"/> Check here if the current year is the organization's first as a non-functionally-integrated Type III supporting organization (see instructions)			

Schedule A (Form 990) 2021

Page 7

Schedule A (Form 990) 2021

Page 7

**Part V Type III Non-Functionally Integrated 509(a)(3) Supporting Organizations** (continued)

<b>Section D - Distributions</b>			Current Year	
<b>1</b>	Amounts paid to supported organizations to accomplish exempt purposes	<b>1</b>		
<b>2</b>	Amounts paid to perform activity that directly furthers exempt purposes of supported organizations, in excess of income from activity	<b>2</b>		
<b>3</b>	Administrative expenses paid to accomplish exempt purposes of supported organizations	<b>3</b>		
<b>4</b>	Amounts paid to acquire exempt-use assets	<b>4</b>		
<b>5</b>	Qualified set-aside amounts (prior IRS approval required - provide details in <b>Part VI</b> )	<b>5</b>		
<b>6</b>	Other distributions (describe in <b>Part VI</b> ). See instructions	<b>6</b>		
<b>7</b>	<b>Total annual distributions.</b> Add lines 1 through 6.	<b>7</b>		
<b>8</b>	Distributions to attentive supported organizations to which the organization is responsive (provide details in <b>Part VI</b> ). See instructions	<b>8</b>		
<b>9</b>	Distributable amount for 2021 from Section C, line 6	<b>9</b>		
<b>10</b>	Line 8 amount divided by Line 9 amount	<b>10</b>		
<b>Section E - Distribution Allocations</b> (see instructions)		(i) Excess Distributions	(ii) Underdistributions Pre-2021	(iii) Distributable Amount for 2021
<b>1</b>	Distributable amount for 2021 from Section C, line 6			
<b>2</b>	Underdistributions, if any, for years prior to 2021 (reasonable cause required-- explain in <b>Part VI</b> ). See instructions.			
<b>3</b>	Excess distributions carryover, if any, to 2021:			
<b>a</b>	From 2016. . . . .			
<b>b</b>	From 2017. . . . .			
<b>c</b>	From 2018. . . . .			
<b>d</b>	From 2019. . . . .			
<b>e</b>	From 2020. . . . .			
<b>f</b>	<b>Total</b> of lines 3a through e			
<b>g</b>	Applied to underdistributions of prior years			
<b>h</b>	Applied to 2021 distributable amount			
<b>i</b>	Carryover from 2016 not applied (see instructions)			
<b>j</b>	Remainder. Subtract lines 3g, 3h, and 3i from line 3f.			
<b>4</b>	Distributions for 2021 from Section D, line 7: \$			
<b>a</b>	Applied to underdistributions of prior years			
<b>b</b>	Applied to 2021 distributable amount			

<b>c</b> Remainder. Subtract lines 4a and 4b from line 4.			
<b>5</b> Remaining underdistributions for years prior to 2021, if any. Subtract lines 3g and 4a from line 2. If the amount is greater than zero, <i>explain in Part VI</i> . See instructions.			
<b>6</b> Remaining underdistributions for 2021. Subtract lines 3h and 4b from line 1. If the amount is greater than zero, <i>explain in Part VI</i> . See instructions.			
<b>7</b> <b>Excess distributions carryover to 2022.</b> Add lines 3j and 4c.			
<b>8</b> Breakdown of line 7:			
<b>a</b> Excess from 2017. . . . .			
<b>b</b> Excess from 2018. . . . .			
<b>c</b> Excess from 2019. . . . .			
<b>d</b> Excess from 2020. . . . .			
<b>e</b> Excess from 2021. . . . .			

Schedule A (Form 990) (2021)

**Part VI** **Supplemental Information.** Provide the explanations required by Part II, line 10; Part II, line 17a or 17b; Part III, line 12; Part IV, Section A, lines 1, 2, 3b, 3c, 4b, 4c, 5a, 6, 9a, 9b, 9c, 11a, 11b, and 11c; Part IV, Section B, lines 1 and 2; Part IV, Section C, line 1; Part IV, Section D, lines 2 and 3; Part IV, Section E, lines 1c, 2a, 2b, 3a and 3b; Part V, line 1; Part V, Section B, line 1e; Part V Section D, lines 5, 6, and 8; and Part V, Section E, lines 2, 5, and 6. Also complete this part for any additional information. (See instructions).

Facts And Circumstances Test	

Return Reference	Explanation
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Schedule A (Form 990) 2021

Additional Data

Return to Form

Software ID:  
Software Version:

<b>efile Public Visual Render</b>	<b>ObjectID: 202410309349300101 - Submission: 2024-01-30</b>	<b>TIN: 82-2750315</b>
<b>SCHEDULE D</b> (Form 990)	<b>Supplemental Financial Statements</b>	OMB No. 1545-0047
Department of the Treasury Internal Revenue Service	<b>Complete if the organization answered "Yes," on Form 990, Part IV, line 6, 7, 8, 9, 10, 11a, 11b, 11c, 11d, 11e, 11f, 12a, or 12b.</b> <b>Attach to Form 990.</b> <b>Go to <a href="http://www.irs.gov/Form990">www.irs.gov/Form990</a> for instructions and the latest information.</b>	<b>2021</b> Open to Public Inspection

<b>Name of the organization</b> UNITE THE PEOPLE INC	<b>Employer identification number</b> 82-2750315
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<b>Part I Organizations Maintaining Donor Advised Funds or Other Similar Funds or Accounts.</b> Complete if the organization answered "Yes" on Form 990, Part IV, line 6.		
	<b>(a) Donor advised funds</b>	<b>(b) Funds and other accounts</b>
<b>1</b> Total number at end of year . . . . .		
<b>2</b> Aggregate value of contributions to (during year)		
<b>3</b> Aggregate value of grants from (during year)		
<b>4</b> Aggregate value at end of year . . . . .		
<b>5</b> Did the organization inform all donors and donor advisors in writing that the assets held in donor advised funds are the organization's property, subject to the organization's exclusive legal control? . . . . .	<input type="checkbox"/> Yes <input type="checkbox"/> No	
<b>6</b> Did the organization inform all grantees, donors, and donor advisors in writing that grant funds can be used only for charitable purposes and not for the benefit of the donor or donor advisor, or for any other purpose conferring impermissible private benefit? . . . . .	<input type="checkbox"/> Yes <input type="checkbox"/> No	

<b>Part II Conservation Easements.</b> Complete if the organization answered "Yes" on Form 990, Part IV, line 7.		
<b>1</b> Purpose(s) of conservation easements held by the organization (check all that apply). <input type="checkbox"/> Preservation of land for public use (e.g., recreation or education) <input type="checkbox"/> Protection of natural habitat <input type="checkbox"/> Preservation of open space <input type="checkbox"/> Preservation of an historically important land area <input type="checkbox"/> Preservation of a certified historic structure		
<b>2</b> Complete lines 2a through 2d if the organization held a qualified conservation contribution in the form of a conservation easement on the last day of the tax year.		
<b>a</b> Total number of conservation easements . . . . .	<b>2a</b>	<b>Held at the End of the Year</b>
<b>b</b> Total acreage restricted by conservation easements . . . . .	<b>2b</b>	
<b>c</b> Number of conservation easements on a certified historic structure included in (a) . . . . .	<b>2c</b>	
<b>d</b> Number of conservation easements included in (c) acquired after 7/25/06, and not on a historic structure listed in the National Register . . . . .	<b>2d</b>	
<b>3</b> Number of conservation easements modified, transferred, released, extinguished, or terminated by the organization during the tax year ►		
<b>4</b> Number of states where property subject to conservation easement is located ►		
<b>5</b> Does the organization have a written policy regarding the periodic monitoring, inspection, handling of violations, and enforcement of the conservation easements it holds? . . . . .	<input type="checkbox"/> Yes <input type="checkbox"/> No	
<b>6</b> Staff and volunteer hours devoted to monitoring, inspecting, handling of violations, and enforcing conservation easements during the year ►		
<b>7</b> Amount of expenses incurred in monitoring, inspecting, handling of violations, and enforcing conservation easements during the year ► \$		
<b>8</b> Does each conservation easement reported on line 2(d) above satisfy the requirements of section 170(h)(4)(B)(i) and section 170(h)(4)(B)(ii)? . . . . .	<input type="checkbox"/> Yes <input type="checkbox"/> No	
<b>9</b> In Part XIII, describe how the organization reports conservation easements in its revenue and expense statement, and balance sheet, and include, if applicable, the text of the footnote to the organization's financial statements that describes the organization's accounting for conservation easements.		

<b>Part III Organizations Maintaining Collections of Art, Historical Treasures, or Other Similar Assets.</b> Complete if the organization answered "Yes" on Form 990, Part IV, line 8.		
<b>1a</b> If the organization elected, as permitted under FASB ASC 958, not to report in its revenue statement and balance sheet works of art, historical treasures, or other similar assets held for public exhibition, education, or research in furtherance of public service, provide, in Part XIII, the text of the footnote to its financial statements that describes these items.		
<b>b</b> If the organization elected, as permitted under FASB ASC 958, to report in its revenue statement and balance sheet works of art, historical treasures, or other similar assets held for public exhibition, education, or research in furtherance of public service, provide the following amounts relating to these items: <b>(i)</b> Revenue included on Form 990, Part VIII, line 1 . . . . . ► \$ <b>(ii)</b> Assets included in Form 990, Part X . . . . . ► \$		
<b>2</b> If the organization received or held works of art, historical treasures, or other similar assets for financial gain, provide the following amounts required to be reported under FASB ASC 958 relating to these items: <b>a</b> Revenue included on Form 990, Part VIII, line 1 . . . . . ► \$ <b>b</b> Assets included in Form 990, Part X . . . . . ► \$		

Part III Organizations Maintaining Collections of Art, Historical Treasures, or Other Similar Assets (continued)

- 3 Using the organization's acquisition, accession, and other records, check any of the following that are a significant use of its collection items (check all that apply):
- a ☐ Public exhibition

b ☐ Scholarly research

c ☐ Preservation for future generations

d ☐ Loan or exchange programs

e ☐ Other .....
- 4 Provide a description of the organization's collections and explain how they further the organization's exempt purpose in Part XIII.
- 5 During the year, did the organization solicit or receive donations of art, historical treasures or other similar assets to be sold to raise funds rather than to be maintained as part of the organization's collection? . . . ☐ Yes ☐ No

Part IV Escrow and Custodial Arrangements. Complete if the organization answered "Yes" on Form 990, Part IV, line 9, or reported an amount on Form 990, Part X, line 21.

- 1a Is the organization an agent, trustee, custodian or other intermediary for contributions or other assets not included on Form 990, Part X? . . . ☐ Yes ☐ No
- b If "Yes," explain the arrangement in Part XIII and complete the following table:
- |   | Amount |
|---|--------|
| c Beginning balance . . . . .             | 1c     |
| d Additions during the year . . . . .     | 1d     |
| e Distributions during the year . . . . . | 1e     |
| f Ending balance . . . . .                | 1f     |
- 2a Did the organization include an amount on Form 990, Part X, line 21, for escrow or custodial account liability? . . . ☐ Yes ☐ No
- b If "Yes," explain the arrangement in Part XIII. Check here if the explanation has been provided in Part XIII . . . ☐

Part V Endowment Funds. Complete if the organization answered "Yes" on Form 990, Part IV, line 10.

- |  | (a) Current year | (b) Prior year | (c) Two years back | (d) Three years back | (e) Four years back |
|--|------------------|----------------|--------------------|----------------------|---------------------|
| 1a Beginning of year balance . . . . .                     |                  |                |                    |                      |                     |
| b Contributions . . . . .                                  |                  |                |                    |                      |                     |
| c Net investment earnings, gains, and losses               |                  |                |                    |                      |                     |
| d Grants or scholarships . . . . .                         |                  |                |                    |                      |                     |
| e Other expenditures for facilities and programs . . . . . |                  |                |                    |                      |                     |
| f Administrative expenses . . . . .                        |                  |                |                    |                      |                     |
| g End of year balance . . . . .                            |                  |                |                    |                      |                     |
- 2 Provide the estimated percentage of the current year end balance (line 1g, column (a)) held as:
- a Board designated or quasi-endowment ▶ .....
- b Permanent endowment ▶ .....
- c Term endowment ▶ .....
- The percentages on lines 2a, 2b, and 2c should equal 100%.
- 3a Are there endowment funds not in the possession of the organization that are held and administered for the organization by:
- (i) Unrelated organizations . . . . .

(ii) Related organizations . . . . .

b If "Yes" on 3a(ii), are the related organizations listed as required on Schedule R? . . . . .
- |        | Yes | No |
|--------|-----|----|
| 3a(i)  |     |    |
| 3a(ii) |     |    |
| 3b     |     |    |
- 4 Describe in Part XIII the intended uses of the organization's endowment funds.

Part VI Land, Buildings, and Equipment. Complete if the organization answered "Yes" on Form 990, Part IV, line 11a. See Form 990, Part X, line 10.

- | Description of property   | (a) Cost or other basis (investment) | (b) Cost or other basis (other) | (c) Accumulated depreciation | (d) Book value |
|---|--------------------------------------|---------------------------------|------------------------------|----------------|
| 1a Land . . . . .   |                                      |                                 |                              |                |
| b Buildings . . . . .   |                                      |                                 |                              |                |
| c Leasehold improvements  |                                      |                                 |                              |                |
| d Equipment . . . . .   |                                      |                                 |                              |                |
| e Other . . . . .   |                                      |                                 |                              |                |
| Total. Add lines 1a through 1e. (Column (d) must equal Form 990, Part X, column (B), line 10(c).) . . . ▶ |                                      |                                 |                              |                |

Part VII Investments - Other Securities.

Complete if the organization answered "Yes" on Form 990, Part IV, line 11b. See Form 990, Part X, line 12.

(a) Description of security or category (including name of security)	(b) Book value	(c) Method of valuation: Cost or end-of-year market value
(1) Financial derivatives . . . . .		
(2) Closely-held equity interests . . . . .		
(3) Other _____		
(A)		
(B)		
(C)		
(D)		
(E)		
(F)		
(G)		
(H)		
Total. (Column (b) must equal Form 990, Part X, col. (B) line 12.)		

Part VIII Investments - Program Related.

Complete if the organization answered 'Yes' on Form 990, Part IV, line 11c. See Form 990, Part X, line 13.

(a) Description of investment	(b) Book value	(c) Method of valuation: Cost or end-of-year market value
(1)		
(2)		
(3)		
(4)		
(5)		
(6)		
(7)		
(8)		
(9)		
Total. (Column (b) must equal Form 990, Part X, col.(B) line 13.)		

Part IX Other Assets.

Complete if the organization answered 'Yes' on Form 990, Part IV, line 11d. See Form 990, Part X, line 15.

(a) Description	(b) Book value
(1)	
(2)	
(3)	
(4)	
(5)	
(6)	
(7)	
(8)	
(9)	
Total. (Column (b) must equal Form 990, Part X, col.(B) line 15.)	

Part X Other Liabilities.

Complete if the organization answered 'Yes' on Form 990, Part IV, line 11e or 11f. See Form 990, Part X, line 25.

1. (a) Description of liability	(b) Book value
(1) Federal income taxes	

**Total.** (Column (b) must equal Form 990, Part X, col.(B) line 25.)**Schedule D (Form 990) 2021**

Complete if the organization answered 'Yes' on Form 990, Part IV, line 12a.

**Part XII Reconciliation of Expenses per Audited Financial Statements With Expenses per Return.**

Complete if the organization answered 'Yes' on Form 990, Part IV, line 12a.

Part XIII Supplemental Information

Return Reference

Explanation

Software ID:  
Software Version:

<b>efile Public Visual Render</b>	<b>ObjectID: 202410309349300101 - Submission: 2024-01-30</b>	<b>TIN: 82-2750315</b>
<b>SCHEDULE O</b> <b>(Form 990)</b>  Department of the Treasury Internal Revenue Service		OMB No. 1545-0047  <div style="font-size: 2em; font-weight: bold; color: green;">2021</div> Open to Public Inspection
<b>Supplemental Information to Form 990 or 990-EZ</b> Complete to provide information for responses to specific questions on Form 990 or 990-EZ or to provide any additional information. ▶ Attach to Form 990 or 990-EZ. ▶ Go to <a href="http://www.irs.gov/Form990">www.irs.gov/Form990</a> for the latest information.		

Name of the organization UNITE THE PEOPLE INC	<b>Employer identification number</b>  82-2750315
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Return Reference	Explanation
Officer directors etc family relationship Part VI line 2	The protection of first, Unite the Peoples interest when it is contemplating entering into a transaction or arrangement that might benefit the private interest of an officer or director of Unite the People Incorporated or might result in a possible excess of benefits from the transaction
Form 990 governing body review Part VI line 11	COPIES OF FINANCIAL DOCUMENTS ARE SHARED WITH ALL GOVERNING BODIES AS A NORMAL PRACTICE.
Conflict of interest policy compliance Part VI line 12c	The protection of first, Unite the Peoples interest when it is contemplating entering into a transaction or arrangement that might benefit the private interest of an officer or director of Unite the People Incorporated or might result in a possible excess of benefits from the transaction.
CEO executive director top management comp Part VI line 15a	Theres a transparent process when it comes to the decision on who is compensated and at what rate.
Other officer or key employee compensation Part VI line 15b	Theres a transparent process when it comes to the decision on who is compensated and at what rate as it is for the top level management
Governing documents etc available to public Part VI line 19	Transparency is always the policy when it comes to the documents of concern for the public or governing body consumption
List of other fees for services expenses Part IX line 11g	CASH & ELECTRONIC DONATIONS IN ADDITION TO FUNDING FROM OTHER ORGANIZATIONS
List of other expenses Part IX line 24e	ADVERTISING, MARKETING AND STAFF SUPPLIES ACCOUNT FOR THE BULK OF THE EXPENSES THAT ARE NOT AS MUCH EXPLAINED IN DETAIL.

### Additional Data

**Return to Form**

**Software ID:**  
**Software Version:**



# **EXHIBIT 117**

UNITED STATES DISTRICT COURT  
for the  
Southern District of Florida

Megan Pete

Plaintiff

v.

Milagro Elizabeth Cooper

Defendant

Civil Action No. 1:24-cv-24228-CMA

**SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION**

To: Ceasar McDowell

(Name of person to whom this subpoena is directed)

☒ **Testimony:** YOU ARE COMMANDED to appear at the time, date, and place set forth below to testify at a deposition to be taken in this civil action. If you are an organization, you must promptly confer in good faith with the party serving this subpoena about the following matters, or those set forth in an attachment, and you must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on your behalf about these matters:

Place: 865 South Figueroa Street, 10th Floor  
Los Angeles, CA 90017

Date and Time:  
7/25/2025 10:00 am

The deposition will be recorded by this method: Court Reporter and Videographer

☒ **Production:** You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and must permit inspection, copying, testing, or sampling of the material: See Attachment A.

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 7/2/2025

CLERK OF COURT

OR /s/ Marie Hayrapetian

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) Megan Pete, who issues or requests this subpoena, are:

Marie Hayrapetian, Quinn Emanuel Urquhart & Sullivan; 865 S. Figueroa Street, 10th Floor, Los Angeles, CA 90017  
mariehayrapetian@quinnemanuel.com; (213) 443-3000

**Notice to the person who issues or requests this subpoena**

If this subpoena commands the production of documents, electronically stored information, or tangible things before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. 1:24-cv-24228-CMA

**PROOF OF SERVICE**

*(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)*

I received this subpoena for *(name of individual and title, if any)* \_\_\_\_\_  
on *(date)* \_\_\_\_\_ .

☐ I served the subpoena by delivering a copy to the named individual as follows: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_ ; or

☐ I returned the subpoena unexecuted because: \_\_\_\_\_  
\_\_\_\_\_ .

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also  
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of  
\$ \_\_\_\_\_ .

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ 0.00 .

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_  
\_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc.:

**Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)****(c) Place of Compliance.**

**(1) For a Trial, Hearing, or Deposition.** A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
  - (i) is a party or a party's officer; or
  - (ii) is commanded to attend a trial and would not incur substantial expense.

**(2) For Other Discovery.** A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

**(d) Protecting a Person Subject to a Subpoena; Enforcement.**

**(1) Avoiding Undue Burden or Expense; Sanctions.** A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

**(2) Command to Produce Materials or Permit Inspection.**

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

**(3) Quashing or Modifying a Subpoena.**

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

(i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

**(e) Duties in Responding to a Subpoena.**

**(1) Producing Documents or Electronically Stored Information.** These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

**(2) Claiming Privilege or Protection.**

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

**(g) Contempt.**

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

**ATTACHMENT A TO THE SUBPOENA TO TESTIFY AT A DEPOSITION TO  
CEASAR MCDOWELL**

Pursuant to Federal Rule of Civil Procedure 45 and the accompanying subpoena (“Subpoena”), you are hereby requested to produce for inspection and copying the Documents and Communications identified below.

**DEFINITIONS**

Unless otherwise defined, all phrases and words herein shall be accorded their usual meaning and shall be interpreted in their common, ordinary sense. However, for purposes of this Subpoena, the words set forth below shall be defined as follows:

1. **“Communications”** is used in its broadest ordinary sense and shall mean any oral or written statement, dialogue, discussion, exchange, conversation, disclosure, or transmittal of information whether in-person, by telephone, any form of video transmission, mail, e-mail, facsimile, personal delivery, computer transmission, or otherwise. For the avoidance of doubt, the term Communication shall encompass emails, pictures, photographs, recordings, text messages, messages exchanged on any communicative or social media application (*e.g.*, WhatsApp, iMessage, Slack, Facebook Messenger, Google Messages, Microsoft Teams, Zoom, Cisco WebEx, Signal, Line, WeChat, Wickr, Snapchat, Telegram), face-to-face meetings, telephone conversations, or any other means of capturing information.

2. **“Daystar Peterson”** refers to Daystar Peterson, the defendant in the criminal case, *People v. Daystar Peterson*, Case No. BA490599, held before the Los Angeles Superior Court. This criminal action resulted in Daystar Peterson’s conviction for three felony counts: (1) assault with a semiautomatic handgun; (2) carrying a loaded, unregistered firearm in a vehicle; and (3) discharging a firearm with gross negligence.

3. **“Sonstar Peterson”** refers to Sonstar Peterson, the father of Daystar Peterson.

4. **“Defendant”** refers to Milagro Elizabeth Cooper, the Defendant in the litigation titled *Megan Pete v. Milagro Elizabeth Cooper*, Case No. 1:24-cv-24228-CMA, pending before the United States District Court, Southern District of Florida.

5. **“Defendant’s Family”** refers to Defendant Milagro Elizabeth Cooper’s family members, including but not limited to her children, spouse, significant other, parents, or grandparents.

6. **“Documents”** shall have the broadest meaning ascribed to them by Federal Rule of Civil Procedure 34 and Federal Rule of Evidence 1001. The terms shall include any information recorded in any medium, including electronically stored information, whether original, draft, or non-identical copy (*i.e.*, whether different from the original by reason of notations made on each copy or otherwise); whether written, sound or video-recorded, or displayed graphically; whether privileged or otherwise excludable from discovery; and includes, without limitation: notes; data (raw or manipulated); lists; customer lists; itineraries; letters; correspondence; communications of any nature; drawings; designs; telegrams; manuals; books of accounts; purchase orders; order acknowledgements; invoices; checks; money orders; credit memoranda; debit memoranda; contracts; agreements; studies; tabulations; charts; graphs; photographs; photostats; mimeographs; typewriting; painting; graphic reproductions; film; handwriting; videotape recordings; audio tape recordings; compact discs; analyses; books; articles; magazines; newspapers; booklets; circulars; bulletins; notices; computer files, whether on hard or floppy disk, compact disc, tape, or other computer storage devices; computer printouts of any form whatsoever; letters of introduction; letters of referral; summaries; questionnaires and surveys; memoranda; notebooks of any character; summaries or records of personal conversations; telephone records, text messages, e-mails, calendars; Day-Timers; diaries; logs; routing slips or memoranda; reports; publications;

notes; minutes or records of meetings and all other communications of any type, including inter-office and intra-office communications; transcripts of oral testimony or statements; affidavits; reports and/or summaries of investigations; agreements and contracts, including all modifications and/or revisions thereof; working papers; reports and/or summaries of negotiations; court papers; brochures; pamphlets; press releases; drafts or revisions of drafts or translations; records and dictation tapes; and all tangible items where information is recorded or likely to be recorded. Any document with any marginalia or marks on any sheet or side thereof, including without limitation, initials, stamped indicia, any comment or any notation of any character and not a part of the original text, or any reproduction thereof, is considered to be a separate document for purposes of this request.

7. **“Item of Value”** refers to any object given by Daystar Peterson or Sonstar Peterson to Defendant, including but not limited to automobiles, clothing, jewelry, travel expenses, dining, children’s toys, and payment of rent, utilities, cellular phone, or other bills.

8. **“Payment”** means any financial activity between Daystar Peterson, Sonstar Peterson, and Defendant, including but not limited to all deposits, monetary transfers, wires, withdrawals, checks received and written, direct deposits to any bank account(s) or using any financial service, including but not limited to PayPal, Venmo, Cash App, Chime, and Zelle.

9. **“Ms. Pete”** refer to Megan Pete, the Plaintiff in the litigation titled *Megan Pete v. Milagro Elizabeth Cooper*, Case No. 1:24-cv-24228-CMA, pending before the United States District Court, Southern District of Florida.

10. **“You”** and **“Your”** refer to you, Ceasar McDowell.

### **INSTRUCTIONS**

1. This Subpoena applies to all Documents in your possession, custody, or control, regardless of their location and irrespective of whether such Documents are held by your officers,

employees, attorneys, accountants, consultants, representatives, agents, or any other Person. You are requested to make a diligent search of your records and other papers and materials in your possession to the extent necessary to provide responsive Documents. Unless otherwise indicated, this Subpoena seeks all Documents that were created or received by you at any time between October 8, 2020 through the present.

2. This Subpoena contains continuing requests. Should you become aware of or acquire possession, custody, or control of additional responsive Documents, you shall promptly produce these additional Documents for inspection and copying.

3. This Subpoena seeks production of each Document in its entirety, without abbreviation or redaction, including, without limitation, all attachments, transmittal sheets, notes, cover letters, exhibits, enclosures, and all drafts and non-identical copies of each Document.

4. If you object to any portion of any request, identify the portion to which you object, answer the remainder, and produce all Documents and parts.

5. If you object to any request as overly broad or unduly burdensome, produce those Documents which are unobjectionable and specifically identify why you believe any request is overly broad or unduly burdensome.

6. If you do not possess any Documents responsive to a particular request, so state.

7. If production of any Document is withheld on a basis of a claim of privilege, each withheld Document shall be separately identified in a privileged document list. The privileged document list must identify each Document separately, specifying for each Document at least: (i) the date the information was created or communicated; (ii) author(s)/sender(s); (iii) all recipient(s); and (iv) the general subject matter contained in the Document. The sender(s) and recipient(s) shall be identified by position and entity (corporation, firm, partnership, etc.) with which they are



employed or associated. If the sender or recipient is an attorney, they shall be so identified. The type of privilege claimed must also be stated, together with a certification, that all elements of the claimed privilege have been met and have not been waived with respect to each Document.

8. Each Document shall be produced in its entirety, including all attachments and disclosures. A Document with handwritten, typewritten, or other recorded notes, editing marks, etc., is a separate, unique Document and is not and shall not be deemed to be identical to one without such additions, deletions, or modifications. If any portion of a Document is responsive to a request, produce the entire Document, including all attachments, enclosures, ‘post-it’ type notes, and any other matter physically attached to the Document. If a responsive Document cannot be produced in full, it shall be produced to the extent possible with an explanation stating why the production of the remainder is not possible.

9. All Documents produced in response to this Subpoena shall be produced in the same order as they are maintained in the ordinary course of business and, where attached, shall not be separated or disassembled.

10. Electronically stored information (“ESI”) should be produced in single-page, black and white, TIFF Group IV, 300 DPI TIFF images with the exception of spreadsheet type files, source code, and audio and video files, which should be produced in native format. If a document is produced in native format, a single-page Bates-stamped image slip stating the document has been produced in native format should also be provided. A load file of the ESI should be included with metadata fields to be mutually agreed upon by the parties.

11. Each request shall be construed independently, and no request shall be viewed as limiting the scope of any other request.

12. Whenever necessary to bring documents within the scope of these Document Requests that might otherwise be construed to be outside their scope:

- i. the use of a verb in any tense shall be construed as the use of that verb in all other tenses;
- ii. the use of a word in its singular form shall be deemed to include within its use the plural form as well;
- iii. unless otherwise stated explicitly herein with regard to a particular Document Request, each Document Request shall be construed independently and not with reference to any other Document Request for the purpose of limitation. The use of the singular form of any word includes the plural and vice versa. The past tense shall include the present tense and vice versa;
- iv. the connectives “and” and “or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of a Document Request all documents that might otherwise be construed to be outside its scope;
- v. the use of any capitalized word shall include the same word uncapitalized, and the use of any uncapitalized word shall include the same word capitalized; and
- vi. the terms “all” and “each” shall be construed as all and each.

**DOCUMENTS REQUESTED**

1. All Documents and Communications between You and Defendant that refer or relate to Ms. Pete.
2. All Documents and Communications between You and Sonstar Peterson that refer or relate to Defendant.
3. All Documents and Communications between You and Daystar Peterson that refer or relate to Defendant.
4. All Documents and Communications that refer or relate to any Payments and/or Items of Value given to Defendant.
5. All Documents and Communications that refer or relate to any Payments and/or Items of Value given to Defendant's Family.

Dated: July 2, 2025

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

/s/ Marie Hayrapetian

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*Attorneys for Plaintiff Megan Pete*

# **EXHIBIT 118**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 24-24228-CIV-ALTONAGA

MEGAN PETE,

Plaintiff,

v.

MILAGRO ELIZABETH COOPER,

Defendant.



**ORDER**

THIS CAUSE came before the Court on the Joint Motion for Entry of Stipulated Protective Order [ECF No. 39]. Being fully advised, it is

**ORDERED AND ADJUDGED** that the Motion is **GRANTED** as follows:

1. **PURPOSES AND LIMITATIONS**

Disclosure and discovery activity in this action are likely to involve production of confidential, proprietary, or private information for which special protection from public disclosure and from use for any purpose other than prosecuting this litigation may be warranted. Accordingly, the parties, by and through their undersigned counsel, having met and conferred, hereby stipulate to and petition the court to enter the following Stipulated Protective Order (the "Order").

The parties acknowledge that this Order does not confer blanket protections on all disclosures or responses to discovery and that the protection it affords from public disclosure and use extends only to the limited information or items that are entitled to confidential treatment under the applicable legal principles. The parties further acknowledge, as set forth in Section 12.3, below, that the procedures for filing any Protected Material, as defined herein, shall be

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governed by S.D. Fla. Local Rule 5.4 sets forth the procedures that must be followed and the standards that will be applied when a party seeks permission from the court to file material under seal.

## 2. DEFINITIONS

2.1 Challenging Party: a Party or Non-Party that challenges the designation of information or items under this Order.

2.2 “CONFIDENTIAL” Information or Items: information (regardless of how it is generated, stored or maintained) or tangible things, shall include any non-public, sensitive business proprietary, or sensitive personal information (including personal financial information), including electronically stored information, documents subject to a separate confidentiality obligation owed by a Producing Entity to a third party; or other information, or which the Producing Entity otherwise believes in good faith to be entitled to protection under Florida or federal law.

2.3 “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY” Information or Items: Extremely sensitive “Confidential Information or Items” (regardless of how it is generated, stored or maintained), including electronically stored information, that a designating party believes in good faith to consist of highly proprietary business, strategic, proprietary, financial commercially sensitive business information, or medical information, or information subject to confidentiality restrictions, trade secrets, or other similar information that is substantially likely to cause injury to the commercial, financial, strategic, or business interests of such producing party or its employees, customers, or clients if disclosed.

2.4 Counsel (without qualifier): Outside Counsel of Record (as well as their support staff).



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2.5 Designating Party: a Party or Non-Party that designates information or items that it produces in disclosures or in responses to discovery as “CONFIDENTIAL” Or “HIGHLY CONFIDENTIAL.”

2.6 Disclosure or Discovery Material: all items or information, regardless of the medium or manner in which it is generated, stored, or maintained (including, among other things, testimony, transcripts, and tangible things), that are produced or generated in disclosures or responses to discovery in this matter.

2.7 Expert: a person with specialized knowledge or experience in a matter pertinent to the litigation who has been retained by a Party or its counsel to serve as an expert witness or as a consultant in this action.

2.8 Non-Party: any natural person, partnership, corporation, association, or other legal entity not named as a Party to this action.

2.9 Outside Counsel of Record: attorneys who are not employees of a party to this action but are retained to represent or advise a party to this action and have appeared in this action on behalf of that party or are affiliated with a law firm which has appeared on behalf of that party.

2.10 Party: any party to this action, consultants, retained experts, and Outside Counsel of Record (and their support staffs).

2.11 Personally Identifiable Information: Customer names, Social Security numbers, account numbers, telephone numbers, mailing addresses, and email addresses.

2.12 Producing Party: a Party or Non-Party that produces Disclosure or Discovery Material in this action.



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2.13 Professional Vendors: persons or entities that provide litigation support services (e.g., photocopying, videotaping, translating, preparing exhibits or demonstrations, and organizing, storing, or retrieving data in any form or medium) and their employees and subcontractors.

2.14 Protected Material: any Disclosure or Discovery Material that is designated as “CONFIDENTIAL” Or “HIGHLY CONFIDENTIAL.”

2.15 Receiving Party: a Party that receives Disclosure or Discovery Material from a Producing Party.

### 3. SCOPE

The protections conferred by this Stipulation and Order cover not only Protected Material (as defined above), but also (1) any information copied or extracted from Protected Material; (2) all copies, excerpts, summaries, or compilations of Protected Material; and (3) any testimony, conversations, or presentations by Parties or their Counsel that might reveal Protected Material. However, the protections conferred by this Stipulation and Order do not cover the following information: (a) any information that is in the public domain at the time of disclosure to a Receiving Party or becomes part of the public domain after its disclosure to a Receiving Party as a result of publication not involving a violation of this Order, including becoming part of the public record through trial or otherwise; and (b) any information known to the Receiving Party prior to the disclosure or obtained by the Receiving Party after the disclosure from a source who obtained the information lawfully and under no obligation of confidentiality to the Designating Party. Any use of Protected Material at trial shall be governed by a separate agreement or order.

4. DURATION

Even after final disposition of this litigation, the confidentiality obligations imposed by this Order shall remain in effect until a Designating Party agrees otherwise in writing or a court order otherwise directs. Final disposition shall be deemed to be the later of (1) dismissal of all claims and defenses in this action, with or without prejudice; and (2) final judgment herein after the completion and exhaustion of all appeals, rehearings, remands, trials, or reviews of this action, including the time limits for filing any motions or applications for extension of time pursuant to applicable law.

5. DESIGNATING PROTECTED MATERIAL

5.1 Exercise of Restraint and Care in Designating Material for Protection. Each Party or Non-Party that designates information or items for protection under this Order must take care to limit any such designation to specific material that qualifies under the appropriate standards. To the extent it is practicable to do so, the Designating Party must designate for protection only those parts of material, documents, items, or oral or written communications that qualify – so that other portions of the material, documents, items, or communications for which protection is not warranted are not swept unjustifiably within the ambit of this Order.

Designations that are shown to be clearly unjustified or that have been made for an improper purpose (e.g., to unnecessarily encumber or retard the case development process or to impose unnecessary expenses and burdens on other parties) may expose the Designating Party to sanctions pursuant to applicable law.

If it comes to a Designating Party's attention that information or items that it designated for protection do not qualify for protection, that Designating Party must promptly notify all other Parties that it is withdrawing the mistaken designation.

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5.2 Manner and Timing of Designations. Except as otherwise provided in this Order (see, e.g., second paragraph of section 5.2(a) below), or as otherwise stipulated or ordered, Disclosure or Discovery Material that qualifies for protection under this Order must be clearly so designated before the material is disclosed or produced.

Designation in conformity with this Order requires:

5.2.1 For information in documentary form (e.g., paper or electronic documents, but excluding transcripts of depositions or other pretrial or trial proceedings), that the Producing Party affix the legend “CONFIDENTIAL” or “HIGHLY CONFIDENTIAL” to each page that contains protected material except as otherwise set forth in other orders adopted in this Action. If only a portion or portions of the material on a page qualifies for protection, the Producing Party also must clearly identify the protected portion(s) (e.g., by making appropriate markings in the margins).

A Party or Non-Party that makes original documents or materials available for inspection need not designate them for protection until after the inspecting Party has indicated which material it would like copied and produced. During the inspection and before the designation, all of the material made available for inspection shall be deemed “CONFIDENTIAL” or “HIGHLY CONFIDENTIAL” as determined by the Producing Party. After the receiving Party has identified the documents it wants copied and produced, the Producing Party must determine which documents, or portions thereof, qualify for protection under this Order. Then, before producing the specified documents, the Producing Party must affix the “CONFIDENTIAL” or “HIGHLY CONFIDENTIAL” legend to each page that contains Protected Material. If only a portion or portions of the



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material on a page qualifies for protection, the Producing Party also must clearly identify the protected portion(s) (e.g., by making appropriate markings in the margins).

5.2.2 All deposition testimony shall presumptively be treated as HIGHLY CONFIDENTIAL and subject to this Stipulation during the deposition and for a period of thirty (30) calendar days after a final transcript of said deposition is received by counsel for each of the parties. For testimony given in a deposition or in other pretrial or trial proceedings the Designating Party shall identify on the record or up to 30 days after a final transcript of the testimony has been received by counsel for each of the parties (or a period otherwise agreed upon) all Protected Material, including specifying whether any portions of the transcript or the entire transcript shall be treated as “CONFIDENTIAL” or “HIGHLY CONFIDENTIAL.” Notwithstanding any of the foregoing, parties to this Action who are natural persons may attend and observe depositions in this Action.

The use of a document as an exhibit at a deposition shall not in any way affect its designation as “CONFIDENTIAL” or “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY.” If, after the 30-day period (or otherwise agreed upon), no Party has designated some or all of the deposition transcript as Protected Material under this Order, the entire deposition, or those portions of the deposition not designated as Protected Material, will no longer be considered confidential. If any party or non-party wishes to use information at a deposition that is designated HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY – any persons who are attending the deposition and who do not fall within one of the categories listed in Section 7.3 of this Stipulation must, upon request, leave the deposition room while such information is being discussed.

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5.2.3 for information produced in some form other than documentary and for any other tangible items, that the Producing Party affix in a prominent place on the exterior of the container or containers in which the information or item is stored the legend “CONFIDENTIAL” or “HIGHLY CONFIDENTIAL.” If only a portion or portions of the information or item warrant protection, the Producing Party, to the extent practicable, shall identify the protected portion(s).

5.3 Inadvertent Failures to Designate. If timely corrected, an inadvertent failure to designate qualified information or items does not, standing alone, waive the Designating Party’s right to secure protection under this Order for such material. Upon timely correction of a designation, the Receiving Party must make reasonable efforts to assure that the material is treated in accordance with the provisions of this Order.

6. CHALLENGING CONFIDENTIALITY DESIGNATIONS

6.1 Timing of Challenges. Any Party or Non-Party may challenge a designation of confidentiality at any time. Unless a prompt challenge to a Designating Party’s confidentiality designation is necessary to avoid foreseeable, substantial unfairness, unnecessary economic burdens, or a significant disruption or delay of the litigation, a Party does not waive its right to challenge a confidentiality designation by electing not to mount a challenge promptly after the original designation is disclosed.

6.2 Meet and Confer. The Challenging Party shall initiate the dispute resolution process by providing written notice of each designation it is challenging and describing the basis for each challenge. To avoid ambiguity as to whether a challenge has been made, the written notice must recite that the challenge to confidentiality is being made in accordance with this specific paragraph of the Protective Order. The parties shall attempt to resolve each challenge in

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good faith and must begin the process by conferring directly (in voice to voice dialogue; other forms of communication are not sufficient) within 14 days of the date of service of notice. In conferring, the Challenging Party must explain the basis for its belief that the confidentiality designation was not proper and must give the Designating Party an opportunity to review the designated material, to reconsider the circumstances, and, if no change in designation is offered, to explain the basis for the chosen designation. A Challenging Party may proceed to the next stage of the challenge process only if it has engaged in this meet and confer process first or establishes that the Designating Party is unwilling to participate in the meet and confer process in a timely manner. Nothing in this paragraph precludes the Parties from agreeing to reasonable extensions at any step of the process described herein.

6.3 Judicial Intervention. If the Parties cannot resolve a challenge without court intervention, the Designating Party shall file and serve a motion to retain confidentiality under the Local Rules within 21 days of the initial notice of challenge or within 14 days of the parties agreeing that the meet and confer process will not resolve their dispute, whichever is earlier, or in the manner designated by the Court's discovery order, including any orders pertaining to discovery challenges entered by a United States Magistrate Judge. Each such motion must be accompanied by a competent declaration affirming that the movant has complied with the meet and confer requirements imposed in the preceding paragraph. Failure by the Designating Party to make such a motion including the required declaration within 21 days (or 14 days, if applicable) shall automatically waive the confidentiality designation for each challenged designation. In addition, the Challenging Party may file a motion challenging a confidentiality designation at any time if there is good cause for doing so, including a challenge to the designation of a deposition transcript or any portions thereof. Any motion brought pursuant to



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this provision must be accompanied by a competent declaration affirming that the movant has complied with the meet and confer requirements imposed by the preceding paragraph.

6.4 The burden of persuasion in any such challenge proceeding shall be on the Designating Party. Frivolous challenges, and those made for an improper purpose (e.g., to harass or impose unnecessary expenses and burdens on other parties) may expose the Challenging Party to sanctions pursuant to applicable law. Unless the Designating Party has waived the confidentiality designation by failing to file a motion to retain confidentiality as described above, all parties shall continue to afford the material in question the level of protection to which it is entitled under the Producing Party's designation until the court rules on the challenge.

7. ACCESS TO AND USE OF PROTECTED MATERIAL

7.1 Basic Principles. A Receiving Party may use Protected Material that is disclosed or produced by another Party or by a Non-Party in connection with this case only for prosecuting, defending, or attempting to settle this litigation. Such Protected Material may be disclosed only to the categories of persons and under the conditions described in this Order. When the litigation has been terminated, a Receiving Party must comply with the provisions of section 13 below (FINAL DISPOSITION).

Protected Material must be stored and maintained by a Receiving Party at a location and in a secure manner that ensures that access is limited to the persons authorized under this Order.

7.2 Disclosure of "CONFIDENTIAL" Information or Items. Unless otherwise ordered by the court or permitted in writing by the Designating Party, a Receiving Party may disclose any information or item designated "CONFIDENTIAL" only to:

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7.2.1 the Receiving Party's Outside Counsel of Record in this action, as well as employees of said Outside Counsel of Record to whom it is reasonably necessary to disclose the information for this litigation;

7.2.2 the officers, directors, and employees (including House Counsel) of the Receiving Party to whom disclosure is reasonably necessary for this litigation and who have signed the "Acknowledgment and Agreement to Be Bound" (Exhibit A);

7.2.3 Experts (as defined in this Order) of the Receiving Party to whom disclosure is reasonably necessary for this litigation and who have signed the "Acknowledgment and Agreement to Be Bound" (Exhibit A);

7.2.4 the Court, Magistrate Judge and their personnel; and any appellate court or other court (and their personnel) before which the Parties appear in this Action;

7.2.5 court reporters, videographers, and their staff, professional jury or trial consultants, mock jurors, and Professional Vendors to whom disclosure is reasonably necessary for this litigation and who have signed the "Acknowledgment and Agreement to Be Bound" (Exhibit A);

7.2.6 during their depositions, witnesses in the action to whom disclosure is reasonably necessary and who have signed the "Acknowledgment and Agreement to Be Bound" (Exhibit A), unless otherwise agreed by the Designating Party or ordered by the court. Pages of transcribed deposition testimony or exhibits to depositions that reveal Protected Material must be separately bound by the court reporter and may not be disclosed to anyone except as permitted under this Stipulated Protective Order.

7.2.7 the author or recipient of a document containing the information or a custodian or other person who otherwise possessed or knew the information.



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7.2.8 Special masters or discovery referees who may be appointed by the Court;

7.2.9 Mediators or settlement officers, and their supporting personnel, subject to the mutual agreement of the Parties engaged in settlement discussions who have signed the “Acknowledgment and Agreement to Be Bound” (Exhibit A).

7.2.10 Any other person as to whom the Designating Party has consented to disclosure in advance; and

7.2.11 Such other persons as the Parties may agree or may be ordered by the Court.

7.3 Disclosure of “HIGHLY CONFIDENTIAL” Information or Items. Unless otherwise ordered by the court or permitted in writing by the Designating Party, a Receiving Party may disclose any information or item designated “HIGHLY CONFIDENTIAL” only to:

7.3.1 the Receiving Party’s Outside Counsel of Record in this action, as well as employees of said Outside Counsel of Record to whom it is reasonably necessary to disclose the information for this litigation;

7.3.2 Experts (as defined in this Order) of the Receiving Party to whom disclosure is reasonably necessary for this litigation and who have signed the “Acknowledgment and Agreement to Be Bound” (Exhibit A) unless otherwise agreed in writing by the Designating Party or ordered by the Court;

7.3.3 The Court, Magistrate Judge and their personnel; and any appellate court or other court (and their personnel) before which the Parties appear in this action;

7.3.4 court reporters, videographers, and their staff, professional jury or trial consultants, mock jurors, and Professional Vendors to whom disclosure is reasonably

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necessary for this litigation and who have signed the “Acknowledgment and Agreement to Be Bound” (Exhibit A);

7.3.5 during their depositions, witnesses in the action to whom disclosure is reasonably necessary and who have signed the “Acknowledgment and Agreement to Be Bound” (Exhibit A), unless otherwise agreed by the Designating Party or ordered by the court. Pages of transcribed deposition testimony or exhibits to depositions that reveal Protected Material must be separately bound by the court reporter and may not be disclosed to anyone except as permitted under this Stipulated Protective Order.

7.3.6 Special masters or discovery referees who may be appointed by the Court;

7.3.7 Mediators or settlement officers, and their supporting personnel, subject to the mutual agreement of the Parties engaged in settlement discussions, and who have signed the “Acknowledgment and Agreement to Be Bound” (Exhibit A).

7.3.8 the author or recipient of a document containing the information or a custodian or other person who otherwise possessed or knew the information.

8. PROTECTED MATERIAL SUBPOENAED OR ORDERED PRODUCED IN OTHER LITIGATION

8.1 If a Party is served with a subpoena or a court order issued in other litigation that compels disclosure of any information or items designated in this action as “CONFIDENTIAL” or “HIGHLY CONFIDENTIAL” that Party must:

8.1.1 (a) promptly notify in writing the Designating Party. Such notification shall include a copy of the subpoena or court order;

8.1.2 (b) promptly notify in writing the party who caused the subpoena or order to issue in the other litigation that some or all of the material covered by the subpoena or

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order is subject to this Protective Order. Such notification shall include a copy of this Stipulated Protective Order; and

8.1.3 (c) cooperate with respect to all reasonable procedures sought to be pursued by the Designating Party whose Protected Material may be affected.

8.2 If the Designating Party timely seeks a protective order, the Party served with the subpoena or court order shall not produce any information designated in this action as “CONFIDENTIAL” or “HIGHLY CONFIDENTIAL” before a determination by the court from which the subpoena or order issued, unless the Party has obtained the Designating Party’s permission. The Designating Party shall bear the burden and expense of seeking protection in that court of its confidential material – and nothing in these provisions should be construed as authorizing or encouraging a Receiving Party in this action to disobey a lawful directive from another court.

#### 9. A NON-PARTY’S PROTECTED MATERIAL SOUGHT TO BE PRODUCED IN THIS LITIGATION

9.1 The terms of this Order are applicable to information produced by a Non-Party in this action and designated as “CONFIDENTIAL” or “HIGHLY CONFIDENTIAL.” A party may designate as CONFIDENTIAL OR HIGHLY CONFIDENTIAL subject to this Stipulation any document, information, or deposition testimony produced or given by any Non-Party to this case, or any portion thereof. Such information produced by Non-Parties in connection with this Action is protected by the remedies and relief provided by this Order. Nothing in these provisions should be construed as prohibiting a Non-Party from seeking additional protections.



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9.2 In the event that a Party is required, by a valid discovery request, to produce a Non-Party's confidential information in its possession, and the Party is subject to an agreement with the Non-Party not to produce the Non-Party's confidential information, then the Party shall:

9.2.1 promptly notify in writing the Requesting Party and the Non-Party that some or all of the information requested is subject to a confidentiality agreement with a Non-Party;

9.2.2 promptly provide the Non-Party with a copy of the Stipulated Protective Order in this litigation, the relevant discovery request(s), and a reasonably specific description of the information requested; and

9.2.3 make the information requested available for inspection by the Non-Party.

9.2.4 If the Non-Party fails to object or seek a protective order from this court within 14 days of receiving the notice and accompanying information, the Receiving Party may produce the Non-Party's confidential information responsive to the discovery request. If the Non-Party timely seeks a protective order, the Receiving Party shall not produce any information in its possession or control that is subject to the confidentiality agreement with the Non-Party before a determination by the court. Absent a court order to the contrary, the Non-Party shall bear the burden and expense of seeking protection in this court of its Protected Material.

10. UNAUTHORIZED DISCLOSURE OF PROTECTED MATERIAL

If a Receiving Party learns that, by inadvertence or otherwise, it has disclosed Protected Material to any person or in any circumstance not authorized under this Stipulated Protective Order, the Receiving Party must immediately (a) notify in writing the Designating Party of the unauthorized disclosures, (b) use its best efforts to retrieve all unauthorized copies of the

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Protected Material, (c) inform the person or persons to whom unauthorized disclosures were made of all the terms of this Order, and (d) request such person or persons to execute the "Acknowledgment and Agreement to Be Bound" that is attached hereto as Exhibit A.

11. INADVERTENT PRODUCTION OF PRIVILEGED OR OTHERWISE PROTECTED MATERIAL

When a Producing Party gives notice to Receiving Parties that certain inadvertently produced material is subject to a claim of privilege or other protection, the obligations of the Receiving Parties are those set forth in Federal Rule of Civil Procedure 26(b)(5)(B). This provision is not intended to modify whatever procedure may be established in an e-discovery order that provides for production without prior privilege review. Pursuant to Federal Rule of Evidence 502(d) and (e), insofar as the parties reach an agreement on the effect of disclosure of a communication or information covered by the attorney-client privilege or work product protection, the parties may incorporate their agreement in the stipulated protective order submitted to the court.

Any inadvertent production of privileged or otherwise protected material that satisfies Federal Rule of Evidence 502(b) shall not be deemed to have waived the privilege or protection.

12. MISCELLANEOUS

12.1 Right to Further Relief. Nothing in this Order abridges the right of any person to seek its modification by the court in the future.

12.2 Right to Assert Other Objections. By stipulating to the entry of this Order, no Party is waiving any objections to the production of documents or information on any basis, including, without limitation, the right to object to production of information and/or documents that a Party contends are subject to any confidentiality interest of themselves, or third parties,

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such that disclosure should be precluded notwithstanding the protections of this Order (e.g., in the event of a contractual confidentiality provision between the Producing Party and a third party or a protective order between parties or nonparties in another case). Similarly, no Party waives any right to object on any ground to use in evidence of any of the material covered by this Order.

12.3 Filing Protected Material. Without written permission from the Designating Party or a court order secured after appropriate notice to all interested persons, a Party may not file in the public record in this Action any Protected Material. A Party that seeks to file under seal any Protected Material must comply with Local Rule 5.4. The extent of Protected Material included within any such proposed filings under seal shall be limited to the particular items of information and/or portions of documents that are reasonably necessary to the filing. Pursuant to Local Rule 5.4, the proposed sealed material shall not be filed unless the Court grants the motion to file under seal. The motion to file under seal shall specify the proposed duration of the requested sealing. If, prior to the issuance of a ruling on the motion to file under seal, the moving party elects or is required to publicly file a pleading, motion, memorandum, or other document that attaches or reveals the content of the proposed sealed material, then the moving party must redact from the public filing all content that is the subject of the motion to file under seal.

12.4 No Effect on Designating Party. This Order shall not apply to and shall not limit in any way any Designating Party's use, disclosure or handling of its own Protected Material. Non-Public, Personally Identifiable Information. Producing Party may partially or wholly redact nonpublic, Personally Identifiable Information from any Disclosure of Discovery Material that may contain it.



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13. FINAL DISPOSITION

Within 60 days after the final disposition of this action, as defined in paragraph 4, each Receiving Party must return all Protected Material to the Producing Party or destroy such material except as otherwise required by Florida Bar record retention requirements. As used in this subdivision, "all Protected Material" includes all copies, abstracts, compilations, summaries, and any other format reproducing or capturing any of the Protected Material. Whether the Protected Material is returned or destroyed, the Receiving Party must submit a written certification to the Producing Party (and, if not the same person or entity, to the Designating Party) by the 60 day deadline that (1) identifies (by category, where appropriate) all the Protected Material that was returned or destroyed and (2) affirms that the Receiving Party has not retained any copies, abstracts, compilations, summaries or any other format reproducing or capturing any of the Protected Material. Notwithstanding this provision. Counsel are entitled to retain an archival copy of all pleadings, motion papers, trial, deposition, and hearing transcripts, legal memoranda, correspondence, deposition and trial exhibits, expert reports, attorney work product, and consultant and expert work product, even if such materials contain Protected Material. Any such archival copies that contain or constitute Protected Material remain subject to this Protective Order as set forth in Section 4 (DURATION).

**Notwithstanding language to the contrary in this Protective Order, the parties shall comply with the Scheduling Order [ECF No. 17] and its prohibition on filing discovery motions. Furthermore, the Court does not favor the filing of materials under seal; rather, the parties may redact information they do not wish to have on the public record.**

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**DONE AND ORDERED** in Miami, Florida, this 23rd day of February, 2025.

  
\_\_\_\_\_  
CECILIA M. ALTONAGA  
CHIEF UNITED STATES DISTRICT JUDGE

cc: counsel of record



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## EXHIBIT A

## ACKNOWLEDGMENT AND AGREEMENT TO BE BOUND

I, \_\_\_\_\_ [print or type full name], of \_\_\_\_\_ [print or type full address], declare under penalty of perjury that I have read in its entirety and understand the Stipulated Protective Order that was issued by the United States District Court for the Southern District of Florida on [date] in the case of \_\_\_\_\_ [insert formal name of the case and the number and initials assigned to it by the court]. I agree to comply with and to be bound by all the terms of this Stipulated Protective Order and I understand and acknowledge that failure to so comply could expose me to sanctions and punishment in the nature of contempt. I solemnly promise that I will not disclose in any manner any information or item that is subject to this Stipulated Protective Order to any person or entity except in strict compliance with the provisions of this Order.

I further agree to submit to the jurisdiction of the United States District Court for the Southern District of Florida for the purpose of enforcing the terms of this Stipulated Protective Order, even if such enforcement proceedings occur after termination of this action.

I hereby appoint \_\_\_\_\_ [print or type full name] of \_\_\_\_\_ [print or type full address and telephone number] as my California agent for service of process in connection with this action or any proceedings related to enforcement of this Stipulated Protective Order.

Date: \_\_\_\_\_

City and State where sworn and signed: \_\_\_\_\_

Printed name: \_\_\_\_\_

Signature: \_\_\_\_\_